



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

To: Interested Parties

Date: November 7, 2014

From: Matthew Stuckey, Chief
Permits Branch
Office of Air Quality

Source Name: BRC Rubber & Plastics, Inc.

Permit Level: Significant Permit Modification

Permit Number: 009-34848-00002

Source Location: 623 West Monroe Street, Montpelier, Indiana

Type of Action Taken: Modification at an existing source
Revisions to permit requirements

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the matter referenced above.

The final decision is available on the IDEM website at: <http://www.in.gov/apps/idem/caats/>
To view the document, select Search option 3, then enter permit 34848.

If you would like to request a paper copy of the permit document, please contact IDEM's central file room:

Indiana Government Center North, Room 1201
100 North Senate Avenue, MC 50-07
Indianapolis, IN 46204
Phone: 1-800-451-6027 (ext. 4-0965)
Fax (317) 232-8659

Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

(continues on next page)

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

Thom Maher
BRC Rubber & Plastics, Inc.
589 US 33 South
Churubusco, IN 46723

November 7, 2014

Re: 009-34848-00002
Significant Permit Modification to
Part 70 Renewal No.: T009-32966-00002

Dear Mr. Maher:

BRC Rubber & Plastics, Inc. was issued a Part 70 Operating Permit Renewal No. 009-32966-00002 on February 18, 2014 for a stationary miscellaneous rubber, metal and plastic parts manufacturing operation located at 623 West Monroe Street, Montpelier, Indiana 47359. An application requesting changes to this permit was received on August 4, 2014. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

Please find attached the entire Part 70 Operating Permit as modified. The permit references the below listed attachments. Since these attachments have been provided in previously issued approvals for this source, IDEM OAQ has not included a copy of these attachments with this modification:

- Attachment A: 40 CFR Part 63, Subpart Mmmm (4M), NESHAP for Surface Coating of Miscellaneous Metal Parts and Products
- Attachment B: 40 CFR Part 63, Subpart Pppp (4P), NESHAP for Surface Coating of Miscellaneous Plastic Parts and Products
- Attachment C: 40 CFR Part 60, Subpart Dc, NSPS for Small Industrial-Commercial-Institutional Steam Generating Units
- Attachment D: 40 CFR Part 63, Subpart DDDDD (5D) - NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters
- Attachment E: 40 CFR Part 63, Subpart T - NESHAP for Halogenated Solvent Cleaning

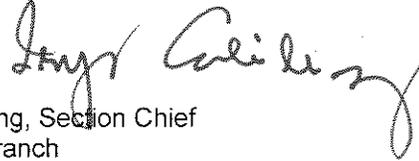
Previously issued approvals for this source containing these attachments are available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>.

Federal rules under Title 40 of United States Code of Federal Regulations may also be found on the U.S. Government Printing Office's Electronic Code of Federal Regulations (eCFR) website, located on the Internet at: http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40tab_02.tpl.

A copy of the permit is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>. For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter, please contact Ryan Graunke, of my staff, at 317-234-5374 or 1-800-451-6027, and ask for extension 4-5374.

Sincerely,



Iryn Calilung, Section Chief
Permits Branch
Office of Air Quality

Attachments: Updated Permit, Technical Support Document, and Appendix A

IC/REG

cc: File - Blackford County
Blackford County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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Commissioner

Part 70 Operating Permit Renewal

OFFICE OF AIR QUALITY

**BRC Rubber & Plastics, Inc.
623 West Monroe Street
Montpelier, Indiana 47359**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T009-32966-00002	
Issued by: Original Signed Iryn Calilung, Section Chief Permits Branch, Office of Air Quality	Issuance Date: February 18, 2014 Expiration Date: February 18, 2019

Significant Permit Modification No.: 009-34848-00002	
Issued by:  Iryn Calilung, Section Chief, Permits Branch Office of Air Quality	Issuance Date: November 7, 2014 Expiration Date: February 18, 2019

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Attachment A: 40 CFR Part 63, Subpart MMMM (4M) - National Emissions Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Miscellaneous Metal Parts and Products

Attachment B: 40 CFR Part 63, Subpart PPPP (4P) - National Emissions Standards for Hazardous Air Pollutants (NESHAP) Surface Coating of Miscellaneous Plastic Parts and Products

Attachment C: 40 CFR Part 60, Subpart Dc - New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units

Attachment D: 40 CFR Part 63, Subpart DDDDD (5D) - National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

Attachment E: 40 CFR Part 63, Subpart T - National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Halogenated Solvent Cleaning

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary miscellaneous rubber, metal and plastic parts manufacturing operation.

Source Address:	623 West Monroe Street, Montpelier, Indiana 47359
General Source Phone Number:	(260) 693-2171
SIC Code:	3069 (Fabricated Rubber Products, Not Elsewhere Classified)
County Location:	Blackford
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Operating Permit Program Minor Source, under PSD Rules Major Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

This stationary source consists of the following emission units and pollution control devices:

Coating Operation:

- (a) Chain-on-edge #2 coating operation, consisting of the following:
- (1) One (1) adhesive application booth, identified as PB1 (Chain-on-edge #2 North, Station 130-1), installed in 2008, equipped with HVLP spray applicators, with nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB1) for particulate control, and exhausting to stack S3;
 - (2) One (1) adhesive application booth, identified as PB2 (Chain-on-edge #2 West, Station 130-2), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB2) for particulate control, and exhausting to stack S4;
 - (3) One (1) adhesive application booth, identified as PB3 (Chain-on-edge #2 South, Station 130-3), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB3) for particulate control, and exhausting to stack S5; and
 - (4) Four (4) electric drying ovens, identified as Oven 1 and Oven 4, exhausting to Stack S6, and Oven 2 and Oven 3, exhausting to Stack S7.

PB1, PB2, and PB3 are considered affected facilities under 40 CFR Part 63, Subpart MMMM (4M) and 40 CFR Part 63, Subpart PPPP (4P).

- (b) Chain-on-edge #1 coating operation, consisting of the following:

- (1) One (1) adhesive application booth, identified as PB4 (Chain-on-edge #1 West, Station 126-1), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB4) for particulate control, and exhausting to stack S8.
- (2) One (1) adhesive application booth, identified as PB5 (Chain-on-edge #1 South, Station 126-2), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB5) for particulate control, and exhausting to stack S9.
- (3) One (1) adhesive application booth, identified as PB14 (Chain-on-edge #1 East, Station 126-3), installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB14) for particulate control, and exhausting to stack S29.
- (4) Four (4) electric drying ovens, identified as Ovens 5 and 6, exhausting to stack S10, and Ovens 17 and 18, and exhausting to stack S30.

PB4, PB5, and PB14 are considered affected facilities under 40 CFR Part 63, Subpart MMMM (4M) and 40 CFR Part 63, Subpart PPPP (4P).

- (c) One (1) adhesive application booth, identified as PB6 (Station 120), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB6) for particulate control, exhausting to Stack S19.

PB6 is considered an affected facility under 40 CFR Part 63, Subpart MMMM (4M) and 40 CFR Part 63, Subpart PPPP (4P).

- (d) Gear machine adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:
 - (1) One (1) adhesive application booth, identified as PB7, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB7) for particulate control, and exhausting to stack S22
 - (2) One (1) adhesive application booth, identified as PB8, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB8) for particulate control, and exhausting to stack S22
 - (3) Two (2) drying ovens, identified as Oven 13 and Oven 14, and exhausting to stack S22.

PB7 and PB8 are considered affected facilities under 40 CFR Part 63, Subpart MMMM (4M) and 40 CFR Part 63, Subpart PPPP (4P).

- (e) Small chain-on-edge #3 coating operation, consisting of the following:
 - (1) One (1) adhesive application booth, identified as PB9 (Station 125), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 1,500 rubber parts per hour, using a dry filter (CPB9) for particulate control, and exhausting to stack S23;
 - (2) One (1) adhesive application booth, identified as PB15, installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 1,500 rubber parts per hour, using a dry filter (CPB15) for particulate control, and exhausting

to stack S31;

- (3) One (1) electric pre-heat oven, identified as Oven 15, exhausting to stack S23; and
- (4) Two (2) electric drying ovens, identified as Oven 19 and Oven 16, exhausting to S23 and indoors, respectively.

PB9 and PB15 are not considered affected facilities under 40 CFR Part 63, Subpart M MMM (4M) and 40 CFR Part 63, Subpart P PPP (4P).

- (f) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

PB10 is considered an affected facility under 40 CFR Part 63, Subpart M MMM (4M) and 40 CFR Part 63, Subpart P PPP (4P).

- (g) One (1) adhesive application booth, identified as PB11 (Station 120), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.

PB11 is considered an affected facility under 40 CFR Part 63, Subpart M MMM (4M) and 40 CFR Part 63, Subpart P PPP (4P).

- (h) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S26.

PB12 is considered an affected facility under 40 CFR Part 63, Subpart M MMM (4M) and 40 CFR Part 63, Subpart P PPP (4P).

- (i) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S27.

PB13 is considered an affected facility under 40 CFR Part 63, Subpart M MMM (4M) and 40 CFR Part 63, Subpart P PPP (4P).

- (j) One (1) roll coater adhesive application system, identified as RC1 (Station 125), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to stack S18.

RC1 is considered an affected facility under 40 CFR Part 63, Subpart M MMM (4M) and 40 CFR Part 63, Subpart P PPP (4P).

- (k) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to Stack S20.

DIP1 is considered an affected facility under 40 CFR Part 63, Subpart M MMM (4M) and

40 CFR Part 63, Subpart PPPP (4P).

- (l) One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

SMDIP is considered an affected facility under 40 CFR Part 63, Subpart MMMM (4M) and 40 CFR Part 63, Subpart PPPP (4P).

Blasters:

- (m) One (1) steel shot blaster, identified as Blaster 1a, installed in 2011, with a nominal capacity of 1,600 pounds of parts per hour and 30.0 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, installed in 1999, and exhausting to Stack S2.
- (n) One (1) steel shot blaster, identified as Blaster 2, installed in January 2004, with a nominal capacity of 477.3 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 12,240 pounds of steel shot per hour, using a self-contained vacuum (CB2) for particulate control, and exhausting indoors.
- (o) One (1) grit blaster, identified as Blaster 3, installed in November 2004, with a nominal capacity of 350.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 2,312.7 pounds of aluminum oxide per hour, using a self-contained vacuum (CB3) for particulate control, and exhausting indoors.
- (p) One (1) grit blaster, identified as Blaster 4, installed in 2005, with a nominal capacity of 80.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 770.9 pounds of aluminum oxide per hour, using a self-contained vacuum (CB4) for particulate control, and exhausting indoors.
- (q) One (1) grit blaster, identified as Blaster 5, installed in 2008, with a nominal capacity of 100.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 770.9 pounds of aluminum oxide per hour, using a self-contained vacuum (CB5) for particulate control, and exhausting indoors.
- (r) One (1) metal casing steel shot blaster, identified as Blaster 6, installed in 2011, with a nominal capacity of 2,143 pounds of parts and steel shot per hour, using a dust collector for particulate control, and exhausting indoors.

Boilers:

- (s) One (1) natural gas-fired boiler, installed in 2007, identified as BLR3, with a nominal heat input capacity of 8.5 million Btu per hour, and exhausting to stack S-BLR3.

BLR3 is considered an affected facility under 40 CFR 63, Subpart DDDDD (5D).

- (t) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a nominal heat input capacity of 14.7 million Btu per hour, and exhausting to stack S-BLR4.

BLR4 is considered an affected facility under 40 CFR 60, Subpart Dc and 40 CFR 63, Subpart DDDDD (5D).

Miscellaneous:

- (u) One (1) flammable liquid storage room, identified as FSTOR, installed prior to 1980, with a nominal capacity of 3,050 gallons, and exhausting to Stack S17.

- (v) One (1) vapor degreaser, identified as VDG1, exhausting to Stack S1, installed in 1997, with an air-to-solvent interface of 15 square feet, with a nominal capacity of 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour, and exhausting to Stack S14.

Under 40 CFR 63, Subpart T, VDG1 is considered an affected facility.

- (w) One (1) parts washer, identified as PW1, installed in 2005, with a nominal capacity of 30 gallons of solvent, and exhausting to Stack S21.

Rubber Mixing and Milling Lines:

- (x) One (1) Primary mixing and milling line, with a nominal capacity of 3500 pounds of rubber ingredients per hour, and consisting of:
 - (1) One (1) Banbury mixer, identified as PMIX, using a baghouse (CE16) for voluntary control, which will be replaced in 2014, exhausting to Stack S16; and
 - (2) One (1) RPRCSS rubber making mill, identified as PMILL, using no control, and exhausting indoors.
- (y) One (1) Secondary mixing and milling line, with a nominal capacity of 1000 pounds of rubber ingredients per hour, and consisting of:
 - (1) One (1) Banbury mixer, identified as SMIX, using a baghouse (CE17) for voluntary control, exhausting to Stack S17; and
 - (2) One (1) RPRCSS rubber making mill, identified as SMILL, using no control, and exhausting indoors.
- (z) One (1) mixing and milling line, approved in 2014 for construction, with a nominal capacity of 3800 pounds of rubber ingredients per hour, and consisting of:
 - (1) One (1) Banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE; and
 - (2) One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) One (1) R&D mixing and milling line, approved in 2014 for construction, with a nominal capacity of 6 pounds of rubber ingredients per hour, using no control, and exhausting indoors, and consisting of:
 - (1) One (1) small Banbury mixer, identified as R&DMIX; and
 - (2) One (1) 30-inch RPRCSS rubber making mill, identified as R&DMILL.
- (b) One (1) rubber dip coating operation, identified as RCOAT, with a nominal capacity of 3500 pounds of rubber per hour and 49,280 pounds of clay coating per year, using no control, and exhausting indoors.

- (c) One (1) self-contained sandblaster, identified as SBLAST, with a nominal throughput rate of 12.5 pounds of sand per day, using a built-in dust collector for particulate control, and exhausting indoors.
- (d) Three (3) carbon silos, identified as CSILOS, with a nominal throughput of 1,700,000 pounds of carbon per year.
- (e) One (1) automatic phosphate line, identified as Phosline #1, installed in January 2003, using no control, exhausting through Stack S11, and consisting of the following:
 - (1) One (1) alkaline soak tank with a nominal capacity of 800 gallons;
 - (2) One (1) acid pickle tank with a nominal capacity of 400 gallons;
 - (3) One (1) phosphate tank with a nominal capacity of 400 gallons;
 - (4) One (1) sealer tank with a nominal capacity of 400 gallons;
 - (5) Four (4) rinse tanks each with a nominal capacity of 400 gallons;
- (f) One (1) manual phosphate line, identified as Phosline #2, using no control, exhausting through Stack S12, and consisting of the following:
 - (1) One (1) alkaline soak tank with a nominal capacity of 400 gallons;
 - (2) One (1) alkaline stripper tank with a nominal capacity of 400 gallons;
 - (3) One (1) hydrochloric acid pickle tank with a nominal capacity of 400 gallons;
 - (4) One (1) phosphate tank with a nominal capacity of 400 gallons;
 - (5) One (1) sealer tank with a nominal capacity of 400 gallons;
 - (6) One (1) alumabrite tank with a nominal capacity of 400 gallons;
- (g) One (1) chlorination tank, installed in 2012, using no control, and exhausting indoors
- (h) Four (4) electric ovens, installed in June 2004 and 2005, identified as:
 - (1) Three (3) heating ovens, identified as Oven 7, Oven 8 and Oven 9, exhausted to Stacks S13, S14, and S15, respectively.
 - (2) One (1) drying oven, identified as Oven 10, exhausted to Stack S16.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5] [326 IAC 2-7-4(a)(1)(D)] [IC 13-15-3-6(a)]

- (a) This permit, T009-32966-00002, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-7-7] [IC 13-17-12]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-7-5(6)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

-
- (a) A certification required by this permit meets the requirements of 326 IAC 2-7-6(1) if:

- (1) it contains a certification by a "responsible official" as defined by 326 IAC 2-7-1(35), and
 - (2) the certification states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) The Permittee may use the attached Certification Form, or its equivalent with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
 - (c) A "responsible official" is defined at 326 IAC 2-7-1(35).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

B.10 Preventive Maintenance Plan [326 IAC 2-7-5(12)] [326 IAC 1-6-3]

(a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit, for the source as described in 326 IAC 1-6-3.

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

The Permittee shall implement the PMPs.

(b) If required by specific condition(s) in Section D of this permit where no PMP was previously required, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) no later than ninety (90) days after issuance of this permit or ninety (90) days after initial start-up, whichever is later, including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The PMP extension notification does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

The Permittee shall implement the PMPs.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions. The PMPs and their submittal do not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance and Enforcement Branch), or
Telephone Number: 317-233-0178 (ask for Office of Air Quality, Compliance and Enforcement Branch)
Facsimile Number: 317-233-6865

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(8) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.12 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to

be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5] [326 IAC 2-7-10.5]

- (a) All terms and conditions of permits established prior to T009-32966-00002 and issued pursuant to permitting programs approved into the state implementation plan have been either:
- (1) incorporated as originally stated,
 - (2) revised under 326 IAC 2-7-10.5, or
 - (3) deleted under 326 IAC 2-7-10.5.
- (b) Provided that all terms and conditions are accurately reflected in this combined permit, all previous registrations and permits are superseded by this combined new source review and part 70 operating permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require a certification that

meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.16 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4] [326 IAC 2-7-8(e)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the

deadline specified, pursuant to 326 IAC 2-7-4(a)(2)(D), in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.17 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.18 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

(a) No Part 70 permit revision or notice shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.19 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b) or (c) without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b)(1) and (c)(1). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1) and (c)(1).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.
-

B.20 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.21 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)] [326 IAC 2-7-6] [62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-1 (Applicability) and 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator except as provided in 326 IAC 4-2 or in this permit. The Permittee shall not operate a refuse incinerator or refuse burning equipment except as provided in 326 IAC 9-1-2 or in this permit.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140 when conducting any asbestos abatement project covered by those rules.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6]

- (a) For performance testing required by this permit, a test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, for all monitoring requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or of initial start-up, whichever is later, to begin such monitoring. If due to circumstances beyond the Permittee's control, any monitoring equipment required by this permit cannot be installed and operated no later than ninety (90) days after permit issuance or the date of initial startup, whichever is later, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.10 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale

such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale. The analog instrument shall be capable of measuring values outside of the normal range.

- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall maintain the most recently submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.12 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.13 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

Upon detecting an excursion where a response step is required by the D Section or an exceedance of a limitation in this permit:

- (a) The Permittee shall take reasonable response steps to restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing excess emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction. The response may include, but is not limited to, the following:
- (1) initial inspection and evaluation;
 - (2) recording that operations returned or are returning to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to normal or usual manner of operation.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
- (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or
 - (3) inspection of the control device, associated capture system, and the process.

- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall record the reasonable response steps taken.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall submit a description of its response actions to IDEM, OAQ, no later than seventy-five (75) days after the date of the test.
- (b) A retest to demonstrate compliance shall be performed no later than one hundred eighty (180) days after the date of the test. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred eighty (180) days is not practicable, IDEM, OAQ may extend the retesting deadline
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

Pursuant to 326 IAC 2-6-3(b)(2), starting in 2005 and every three (3) years thereafter, the Permittee shall submit by July 1 an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

- (1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);
- (2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1(32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35).

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. Support information includes the following, where applicable:
 - (AA) All calibration and maintenance records.
 - (BB) All original strip chart recordings for continuous monitoring instrumentation.

- (CC) Copies of all reports required by the Part 70 permit.
Records of required monitoring information include the following, where applicable:
- (AA) The date, place, as defined in this permit, and time of sampling or measurements.
 - (BB) The dates analyses were performed.
 - (CC) The company or entity that performed the analyses.
 - (DD) The analytical techniques or methods used.
 - (EE) The results of such analyses.
 - (FF) The operating conditions as existing at the time of sampling or measurement.

These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, for all record keeping requirements not already legally required, the Permittee shall be allowed up to ninety (90) days from the date of permit issuance or the date of initial start-up, whichever is later, to begin such record keeping.

C.17 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of this paragraph. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported except that a deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. This report shall be submitted not later than thirty (30) days after the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include a certification that meets the requirements of 326 IAC 2-7-6(1) by a "responsible official" as defined by 326 IAC 2-7-1(35). A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (b) The address for report submittal is:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with applicable standards for recycling and emissions reduction.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Coating Operation:

(a) Chain-on-edge #2 coating operation, consisting of the following:

- (1) One (1) adhesive application booth, identified as PB1 (Chain-on-edge #2 North, Station 130-1), installed in 2008, equipped with HVLP spray applicators, with nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB1) for particulate control, and exhausting to stack S3;
- (2) One (1) adhesive application booth, identified as PB2 (Chain-on-edge #2 West, Station 130-2), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB2) for particulate control, and exhausting to stack S4;
- (3) One (1) adhesive application booth, identified as PB3 (Chain-on-edge #2 South, Station 130-3), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB3) for particulate control, and exhausting to stack S5; and
- (4) Four (4) electric drying ovens, identified as Oven 1 and Oven 4, exhausting to Stack S6, and Oven 2 and Oven 3, exhausting to Stack S7.

PB1, PB2, and PB3 are considered affected facilities under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

(b) Chain-on-edge #1 coating operation, consisting of the following:

- (1) One (1) adhesive application booth, identified as PB4 (Chain-on-edge #1 West, Station 126-1), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB4) for particulate control, and exhausting to stack S8.
- (2) One (1) adhesive application booth, identified as PB5 (Chain-on-edge #1 South, Station 126-2), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB5) for particulate control, and exhausting to stack S9.
- (3) One (1) adhesive application booth, identified as PB14 (Chain-on-edge #1 East, Station 126-3), installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB14) for particulate control, and exhausting to stack S29.
- (4) Four (4) electric drying ovens, identified as Ovens 5 and 6, exhausting to stack S10, and Ovens 17 and 18, and exhausting to stack S30.

PB4, PB5, and PB14 are considered affected facilities under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

(c) One (1) adhesive application booth, identified as PB6 (Station 120), installed in 1993,

equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB6) for particulate control, exhausting to Stack S19.

PB6 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (d) Gear machine adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:
- (1) One (1) adhesive application booth, identified as PB7, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB7) for particulate control, and exhausting to stack S22
 - (2) One (1) adhesive application booth, identified as PB8, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB8) for particulate control, and exhausting to stack S22
 - (3) Two (2) drying ovens, identified as Oven 13 and Oven 14, and exhausting to stack S22.

PB7 and PB8 are considered affected facilities under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (e) Small chain-on-edge #3 coating operation, consisting of the following:
- (1) One (1) adhesive application booth, identified as PB9 (Station 125), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 1,500 rubber parts per hour, using a dry filter (CPB9) for particulate control, and exhausting to stack S23;
 - (2) One (1) adhesive application booth, identified as PB15, installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 1,500 rubber parts per hour, using a dry filter (CPB15) for particulate control, and exhausting to stack S31;
 - (3) One (1) electric pre-heat oven, identified as Oven 15, exhausting to stack S23; and
 - (4) Two (2) electric drying ovens, identified as Oven 19 and Oven 16, exhausting to S23 and indoors, respectively.

PB9 and PB15 are not considered affected facilities under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (f) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

PB10 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (g) One (1) adhesive application booth, identified as PB11 (Station 120), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.

PB11 is considered an affected facility under 40 CFR Part 63, Subpart M MMMM (4M) and 40 CFR Part 63, Subpart P PPPP (4P).

- (h) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S26.

PB12 is considered an affected facility under 40 CFR Part 63, Subpart M MMMM (4M) and 40 CFR Part 63, Subpart P PPPP (4P).

- (i) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S27.

PB13 is considered an affected facility under 40 CFR Part 63, Subpart M MMMM (4M) and 40 CFR Part 63, Subpart P PPPP (4P).

- (j) One (1) roll coater adhesive application system, identified as RC1 (Station 125), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to stack S18.

RC1 is considered an affected facility under 40 CFR Part 63, Subpart M MMMM (4M) and 40 CFR Part 63, Subpart P PPPP (4P).

- (k) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to Stack S20.

DIP1 is considered an affected facility under 40 CFR Part 63, Subpart M MMMM (4M) and 40 CFR Part 63, Subpart P PPPP (4P).

- (l) One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

SMDIP is considered an affected facility under 40 CFR Part 63, Subpart M MMMM (4M) and 40 CFR Part 63, Subpart P PPPP (4P).

Rubber Mixing and Milling Lines:

- (x) One (1) Primary mixing and milling line, with a nominal capacity of 3500 pounds of rubber ingredients per hour, and consisting of:

(1) One (1) Banbury mixer, identified as PMIX, using a baghouse (CE16) for voluntary control, which will be replaced in 2014, exhausting to Stack S16; and

(2) One (1) RPRCSS rubber making mill, identified as PMILL, using no control,

and exhausting indoors.

- (y) One (1) Secondary mixing and milling line, with a nominal capacity of 1000 pounds of rubber ingredients per hour, and consisting of:
 - (1) One (1) Banbury mixer, identified as SMIX, using a baghouse (CE17) for voluntary control, exhausting to Stack S17; and
 - (2) One (1) RPRCSS rubber making mill, identified as SMILL, using no control, and exhausting indoors.
- (z) One (1) mixing and milling line, approved in 2014 for construction, with a nominal capacity of 3800 pounds of rubber ingredients per hour, and consisting of:
 - (1) One (1) Banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE; and
 - (2) One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.

Insignificant:

- (a) One (1) R&D mixing and milling line, approved in 2014 for construction, with a nominal capacity of 6 pounds of rubber ingredients per hour, using no control, and exhausting indoors, and consisting of:
 - (1) One (1) small Banbury mixer; and
 - (2) One (1) 30-inch RPRCSS rubber making mill.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 PSD Minor Limits [326 IAC 2-2]: Volatile Organic Compound (VOC)

In order to render 326 IAC 2-2 not applicable, the total VOC input, including coatings, dilution solvents, and cleaning solvents, to all surface coating units listed in Section D.1 and total input of rubber ingredients to all mixing and milling units shall be limited such that the VOC emissions shall not exceed 224 tons of VOC per twelve consecutive month period, with compliance determined at the end of each month.

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this limit, combined with the potential to emit VOC from all other emission units at this source, shall limit the source-wide total potential to emit VOC to less than 250 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

D.1.2 Volatile Organic Compound (VOC) Emission Limit [326 IAC 8-1-6]

In order to render 326 IAC 8-1-6 not applicable, the VOC input, including coatings, dilution solvents, and cleaning solvents, to the following facilities shall each be limited to less than twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month:

- (a) Chain-on-edge #2 North booth (PB1)
- (b) Chain-on-edge #2 West booth (PB2)
- (c) Chain-on-edge #2 South booth (PB3)
- (d) Gear machine booth (PB7)
- (d) Gear machine booth (PB8)
- (e) Roll coater adhesive application system (RC1)

The amount of VOC in waste shipped offsite may be deducted from the reported monthly VOC input.

Compliance with this limit shall render the requirements of 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities) not applicable to each booth or line.

D.1.3 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(d), particulate emissions from the following facilities shall be controlled by dry filters, and the dry filters shall be operated in accordance with the manufacturer's specifications:

- (a) Chain-on-edge #2 North booth (PB1)
- (b) Chain-on-edge #2 West booth (PB2)
- (c) Chain-on-edge #2 South booth (PB3)
- (d) Chain-on-edge #1 West booth (PB4)
- (e) Chain-on-edge #1 South booth (PB5)
- (f) Chain-on-edge #1 East booth (PB14)
- (g) Adhesive application booth (PB6)
- (h) Gear machine booth (PB7)
- (i) Gear machine booth (PB8)
- (j) Small chain-on-edge coating operation (PB9)
- (k) Small chain-on-edge coating operation (PB15)
- (l) Hand-spray booth (PB10)
- (m) Adhesive application booth (PB11)
- (n) Adhesive application booth (PB12)
- (o) Adhesive application booth (PB13)

D.1.4 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the following units shall not exceed the pounds per hour limit listed in the table below:

Emission unit	Maximum process weight rate (tons per hour)	Particulate emission limit (pounds per hour)
PMIX	1.75	5.97
SMIX	0.5	2.58
NEMIX	1.9	6.30

The pounds per hour limitations were calculated by the following:

Interpolation of the data for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 * P^{0.67}$$

Where: E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B – Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.1.6 Volatile Organic Compound (VOC) Emissions Determination [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC emission limitation contained in Condition D.1.1 shall be determined as follows:

- (a) Monthly VOC emission shall be calculated with the following equation:

$$\text{VOC} = \text{VOC}_{\text{mix}} + \text{VOC}_{\text{mill}} + \text{VOC}_{\text{coat}}$$

Where:

VOC_{mix} = VOC emissions from Banbury mixers (tons/month)

VOC_{mill} = VOC emissions from RPRCSS rubber making mills (tons/month)

VOC_{coat} = VOC emissions from Banbury mixers (tons/month)

For the equations below, the maximum VOC emission factors shall be from the most recent version of the U.S. EPA's AP-42, Chapter 4.12

- (b) VOC emissions (VOC_{mix}) from the Banbury mixers (PMIX, SMIX, NEMIX, and R&D MIX) - shall be calculated using the following equation:

$$\text{VOC}_{\text{mix}} \text{ (tons/month)} = (\text{R}_{\text{mix}} * \text{MEF}_{\text{mix}})/2000$$

Where:

R_{mix} = pounds of rubber mixed per month; and

MEF_{mix} = 2.91×10^{-4} pounds of VOC per pound of rubber or the maximum VOC emission factor for the compounds mixed that month

- (c) VOC emissions from the RPRCSS rubber making mills (PMILL, SMILL, NEMILL, and R&D MILL) shall be calculated using the following equation:

$$\text{VOC}_{\text{mill}} \text{ (tons/month)} = (\text{R}_{\text{mill}} * \text{MEF}_{\text{mill}})/2000$$

Where:

R_{mill} = pounds of rubber milled per month; and

MEF_{mill} = 1.13×10^{-4} pounds of VOC per pound of rubber or the maximum VOC emission factor for the compounds milled that month

- (d) VOC emissions (VOC_{coat} , tons/month) from surface coating units, including coatings, dilution solvents, and cleaning solvents, shall be the VOC input, which shall be calculated as determined in Condition D.1.7.

D.1.7 Volatile Organic Compound (VOC) Emissions Determination [326 IAC 8-1-2] [326 IAC 8-1-4]

- (a) Compliance with the VOC input limit contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

- (b) If the amount of VOC in the waste shipped offsite for recycling or disposal is deducted from the monthly VOC input reported, the Permittee shall determine the VOC content of the waste shipped offsite using one or a combination of the following methods:
- (1) On-Site Sampling
- (A) VOC content shall be determined pursuant to 326 IAC 8-1-4(a)(3) by EPA Reference Method 24 and the sampling procedures in 326 IAC 8-1-4 or other methods as approved by the Commissioner.
- (B) If multiple VOC waste streams are collected and drummed separately, a sample shall be collected and analyzed from each solvent waste stream.
- (C) A new representative sample shall be collected and analyzed whenever a change or changes occur(s) that could result in a cumulative 10% or more decrease in the VOC content of the VOC containing waste. Such change could include, but is not limited to, the following:
- (i) A change in coating selection or formulation, as supplied or as applied, or a change in solvent selection or formulation, or
- (ii) An operational change in the coating application or cleanup operations.
- The new VOC content shall be used in calculating the amount of VOC shipped offsite, starting with the date that the change occurred. The sample shall be collected and analyzed within 30 days of the change.
- (2) Certified Waste Report: The VOC reported by analysis of an offsite waste processor may be used, provided the report certifies the amount of VOC in the waste.
- (3) Minimum Assumed VOC content: The VOC content of the waste shipped offsite may be assumed to be equal to the VOC content of the material with the lowest VOC content that could be present in the waste, as determined using the "as supplied" and "as applied" VOC data sheets, for each month.
- (c) IDEM reserves the right to request a representative sample of the VOC containing waste stream and conduct an analysis for VOC content.
- (d) Compliance with the VOC emission limits contained in Conditions D.1.1 and D.1.2 shall be determined not later than 30 days after the end of each month. This shall be based on the total VOC used for the previous month, minus the VOC shipped off-site, and adding it to the previous 11 months total VOC usage, minus the VOC shipped off-site, so as to arrive at VOC emissions for the most recent twelve (12) consecutive month period.
- (e) The VOC input for a month shall be calculated using the following equation:

$$\text{VOC input} = \text{VOC}_U - \text{VOC}_R$$

Where

$\text{VOC}_U =$ The total amount of VOC, in tons, delivered to the coating applicators, including coatings, dilution solvents, and cleaning solvents; and

$VOC_R =$ The total amount of VOC, in tons, shipped off-site, including coatings, dilution solvents, and cleaning solvents.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.1.8 Surface Coating Particulate Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the dry filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the adhesive application booth stacks (S3, S4, S5, S8, S9, S19, S22, S23, S24, S25, S26, S27, S29, S31) while the booths are in operation. If a condition exists which should result in a response step, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take reasonable response steps shall be considered a deviation from this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks (S3, S4, S5, S8, S9, S19, S22, S23, S24, S25, S26, S27, S29, S31) and the presence of overspray on the sides of the building and the nearby ground. When there is a noticeable change in overspray emissions, or when evidence of overspray emissions is observed, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take response steps shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain the following records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.
 - (1) The amount by weight and type of rubber compounds mixed and milled each month.
 - (2) Monthly calculations demonstrating the weight of the VOC emitted for each compliance period.
- (b) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 - (1) The VOC content of each coating material and solvent used less water.
 - (2) The amount of coating material and solvent used on a monthly basis.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (3) The monthly cleanup solvent usage.

- (4) The total VOC usage for each month.
- (5) If the amount of VOC in the waste material is being deducted from the VOC input as allowed in paragraph (b) of Condition D.1.7, then the following records shall be maintained:
 - (A) The amount of VOC containing waste shipped out to be recycled or disposed of each month. If multiple cleanup solvent waste streams are collected and drummed separately, the amount shipped out shall be recorded separately for each used solvent stream.
 - (B) The VOC content of the waste as determined pursuant to Condition D.1.7(b).
 - (C) The weight of VOC input, minus the weight of VOC shipped out to be recycled or disposed of, for each compliance period.
- (6) The weight of VOC emitted for each compliance period.
- (c) To document the compliance status with Condition D.1.8, the Permittee shall maintain a log of weekly overspray observations and daily filter inspections and monthly overspray inspections of the sides of the building and the nearby ground.
- (d) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.10 Reporting Requirements

A quarterly summary of the information to document the compliance status with Conditions D.1.1 and D.1.2 shall be submitted no later than thirty (30) days after the end of the quarter being reported. Section C - General Reporting Requirements contains the Permittee's obligation with regard to the reporting required by this condition. The report submitted by the Permittee does require a certification that meets the requirements of 326 IAC 2-7-6(1) by a responsible official as defined by 326 IAC 2-7-1(35).

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Blasters:

- (m) One (1) steel shot blaster, identified as Blaster 1a, installed in 2011, with a nominal capacity of 1,600 pounds of parts per hour and 30.0 pounds of steel shot per hour, using a baghouse (CB1) for particulate control, installed in 1999, and exhausting to Stack S2.
- (n) One (1) steel shot blaster, identified as Blaster 2, installed in January 2004, with a nominal capacity of 477.3 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 12,240 pounds of steel shot per hour, using a self-contained vacuum (CB2) for particulate control, and exhausting indoors.
- (o) One (1) grit blaster, identified as Blaster 3, installed in November 2004, with a nominal capacity of 350.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 2,312.7 pounds of aluminum oxide per hour, using a self-contained vacuum (CB3) for particulate control, and exhausting indoors.
- (p) One (1) grit blaster, identified as Blaster 4, installed in 2005, with a nominal capacity of 80.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 770.9 pounds of aluminum oxide per hour, using a self-contained vacuum (CB4) for particulate control, and exhausting indoors.
- (q) One (1) grit blaster, identified as Blaster 5, installed in 2008, with a nominal capacity of 100.0 pounds of miscellaneous metal, plastic, and/or rubber parts per hour and 770.9 pounds of aluminum oxide per hour, using a self-contained vacuum (CB5) for particulate control, and exhausting indoors.
- (r) One (1) metal casing steel shot blaster, identified as Blaster 6, installed in 2011, with a nominal capacity of 2,143 pounds of parts and steel shot per hour, using a dust collector for particulate control, and exhausting indoors.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limits [326 IAC 2-2]: PM, PM₁₀, and PM_{2.5}

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following emission limits for the following abrasive blasters:

Abrasive blaster	PM Limit (pounds per hour)	PM ₁₀ Limit (pounds per hour)	PM _{2.5} Limit (pounds per hour)
Blaster 1a	3.57	3.57	3.57
Blaster 2	14.16	14.16	14.16
Blaster 3	4.97	4.97	4.97
Blaster 4	2.31	2.31	2.31
Blaster 5	2.35	2.35	2.35

Compliance with these limits, combined with the potential to emit PM, PM_{2.5}, and PM₁₀ from all other emission units at this source, shall limit the source-wide total potential to emit of each

pollutant to less than 250 tons per twelve (12) consecutive month period and shall render 326 IAC 2-2 not applicable.

D.2.2 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the following abrasive blasters shall not exceed the pounds per hour limit listed in the table below:

Abrasive blaster	Maximum process weight rate (tons per hour)	Particulate emission limit (pounds per hour)
Blaster 1a	0.82	3.57
Blaster 2	6.36	14.16
Blaster 3	1.33	4.97
Blaster 4	0.43	2.31
Blaster 5	0.44	2.35
Blaster 6	1.07	4.29

The pounds per hour limitations were calculated by the following:

Interpolation of the data for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 * P^{0.67}$$

Where: E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

A Preventive Maintenance Plan is required for these facilities and any control devices. Section B – Preventive Maintenance Plan contains the Permittee's obligation with regard to the preventive maintenance plan required by this condition.

Compliance Determination Requirements

D.2.4 Particulate Control

- (a) In order to comply with Conditions D.2.1 and D.2.2, the baghouse (CB1) for particulate control shall be in operation and control emissions at all times Blaster 1a is in operation.
- (b) In order to comply with Conditions D.2.1 and D.2.2, the four (4) self-contained vacuums (CB2 through CB5) for particulate control shall be in operation and control emissions at all times Blasters 2 through 5 are in operation, respectively.
- (c) In order to comply with Condition D.2.2, the dust collector for particulate control shall be in operation and control emissions at all times Blaster 6 is in operation.
- (d) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

D.2.5 Visible Emissions Notations [40 CFR 64]

- (a) Visible emission notations of Blaster 1a baghouse (CB1) stack exhaust (Stack S2) shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take a reasonable response. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. Failure to take reasonable response steps shall be considered a deviation from this perm

D.2.6 Parametric Monitoring [40 CFR 64]

- (a) The Permittee shall record the pressure drop across the baghouse used in conjunction with Blaster 1a, at least once per day when Blaster 1a is in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 8.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps. Section C - Response to Excursions or Exceedances contains the Permittee's obligation with regard to the reasonable response steps required by this condition. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take reasonable response steps shall be considered a deviation from this permit.
- (b) The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated or replaced at least once every six (6) months or other time period specified by the manufacturer. The Permittee shall maintain records of the manufacturer specifications, if used.

D.2.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the line. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouses pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks or dust traces.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)]

D.2.8 Record Keeping Requirements

- (a) To document the compliance status with Condition D.2.5, the Permittee shall maintain a daily record of visible emission notations of Blaster 1a baghouse (CB1) stack exhaust (Stack S2). The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling Blaster 1a. The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Boilers:

- (s) One (1) natural gas-fired boiler, installed in 2007, identified as BLR3, with a nominal heat input capacity of 8.5 million Btu per hour, and exhausting to stack S-BLR3.

BLR3 is considered an affected facility under 40 CFR 63, Subpart DDDDD (5D).

- (t) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a nominal heat input capacity of 14.7 million Btu per hour, and exhausting to stack S-BLR4.

BLR4 is considered an affected facility under 40 CFR 60, Subpart Dc and 40 CFR 63, Subpart DDDDD (5D).

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Emissions Limitations [326 IAC 6-2]

Pursuant to 326 IAC 6-2-4 (Particulate Limitations for Sources of Indirect Heating),

- (a) the PM emissions from BLR 3 shall be limited to 0.471 pounds per MMBtu heat input.
(b) the PM emissions from BLR 4 shall be limited to 0.481 pounds per MMBtu heat input.

These limitations are based on the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input (lb/MMBtu).
Q = Total source maximum operating capacity rating in million Btu per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Q for BLR3 = 25.24 MMBtu/hr

Q for BLR4 = 23.20 MMBtu/hr

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (v) One (1) vapor degreaser, identified as VDG1, exhausting to Stack S1, installed in 1997, with an air-to-solvent interface of 15 square feet, with a nominal capacity of 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour, and exhausting to Stack S14.

Under 40 CFR 63, Subpart T, VDG1 is considered an affected facility.

- (w) One (1) parts washer, identified as PW1, installed in 2005, with a nominal capacity of 30 gallons of solvent, and exhausting to Stack S21.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Open Top Vapor Degreaser Operation [326 IAC 8-3-3]

- (a) Pursuant to 326 IAC 8-3-3(a), the Permittee shall ensure the following control equipment and operating requirements are met for the vapor degreaser, identified as VDG1:
- (1) Equip the vapor degreaser with a cover that can be opened and closed easily without disturbing the vapor zone.
 - (2) Keep the cover closed at all times except when processing workloads through the degreaser.
 - (3) Minimize solvent carryout by:
 - (A) racking parts to allow complete drainage;
 - (B) moving parts in and out of the degreaser at less than three and three-tenths (3.3) meters per minute (eleven (11) feet per minute);
 - (C) degreasing the workload in the vapor zone at least thirty (30) seconds or until condensation ceases;
 - (D) tipping out any pools of solvent on the cleaned parts before removal; and
 - (E) allowing parts to dry within the degreaser for at least fifteen (15) seconds or until visually dry.
 - (4) Prohibit the entrance into the degreaser of porous or absorbent materials, such as cloth, leather, wood, or rope.
 - (5) Prohibit occupation of more than one-half (1/2) of the degreaser's open top area with the workload.
 - (6) Prohibit the loading of the degreaser in a manner that causes the vapor level to drop more than fifty percent (50%) of the vapor depth when the workload is removed.
 - (7) Prohibit solvent spraying above the vapor level.

- (8) Repair solvent leaks immediately, or shut down the degreaser if leaks cannot be repaired immediately.
 - (9) Store waste solvent only in closed containers.
 - (10) Prohibit the disposal or transfer of waste solvent in a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
 - (11) Prohibit the use of workplace fans near the degreaser opening.
 - (12) Prohibit visually detectable water in the solvent exiting the water separator.
 - (13) Provide the degreaser with a permanent, conspicuous label that lists the operating requirements in subdivisions (2) through (12).
- (b) Pursuant to 326 IAC 8-3-3(b), the Permittee shall ensure the following additional control equipment and operating requirements are met:
- (1) Equip the degreaser with the following switches:
 - (A) A condenser flow switch and thermostat that shuts off sump heat if condenser coolant stops circulating or becomes too warm.
 - (B) A spray safety switch that shuts off spray pump if the vapor level drops more than ten (10) centimeters (four (4) inches).
 - (2) Equip the degreaser with one (1) of the following control devices:
 - (A) A freeboard ratio of seventy-five hundredths (0.75) or greater and a powered cover if the degreaser opening is greater than one (1) square meter (ten and eight-tenths (10.8) square feet).
 - (B) A refrigerated chiller.
 - (C) An enclosed design in which the cover opens only when the article is actually entering or exiting the degreaser.
 - (D) A carbon adsorption system with ventilation that, with the cover open, achieves a ventilation rate of greater than or equal to fifteen (15) cubic meters per minute per square meter (fifty (50) cubic feet per minute per square foot) of air-to-vapor interface area and an average of less than twenty-five (25) parts per million of solvent is exhausted over one (1) complete adsorption cycle.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (3) Prohibit the loading of the degreaser to the point where the vapor level would drop more than ten (10) centimeters (four (4) inches) when the workload is removed.

- (4) Prohibit the exhaust ventilation rate from exceeding twenty (20) cubic meters per minute per square meter (sixty-five (65) cubic feet per minute per square foot) of degreaser open area unless a greater ventilation rate is necessary to meet Occupational Safety and Health Administration requirements.
- (5) Ensure that the label required under subsection (a)(13) includes the additional operating requirements listed in subdivisions (3) and (4).

D.4.2 Cold Cleaner Degreaser Control Equipment and Operating Requirements [326 IAC 8-3-2]

- (a) Pursuant to 326 IAC 8-3-2(a), the Permittee shall ensure the following control equipment and operating requirements are met for the parts washer, identified as PW1:
 - (1) Equip the degreaser with a cover.
 - (2) Equip the degreaser with a device for draining cleaned parts.
 - (3) Close the degreaser cover whenever parts are not being handled in the degreaser.
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases.
 - (5) Provide a permanent, conspicuous label that lists the operating requirements in subdivisions (3), (4), (6), and (7).
 - (6) Store waste solvent only in closed containers.
 - (7) Prohibit the disposal or transfer of waste solvent in such a manner that could allow greater than twenty percent (20%) of the waste solvent (by weight) to evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-2(b), the Permittee shall ensure the following additional control equipment and operating requirements are met:
 - (1) Equip the degreaser with one (1) of the following control devices if the solvent is heated to a temperature of greater than forty-eight and nine-tenths (48.9) degrees Celsius (one hundred twenty (120) degrees Fahrenheit):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) A refrigerated chiller.
 - (D) Carbon adsorption.
 - (E) An alternative system of demonstrated equivalent or better control as those outlined in clauses (A) through (D) that is approved by the department. An alternative system shall be submitted to the U.S. EPA as a SIP revision.
 - (2) Ensure the degreaser cover is designed so that it can be easily operated with one (1) hand if the solvent is agitated or heated.
 - (3) If used, solvent spray:

- (A) must be a solid, fluid stream; and
- (B) shall be applied at a pressure that does not cause excessive splashing.

D.4.3 Material Requirements for Cold Cleaner Degreasers [326 IAC 8-3-8]

Effective January 1, 2015, the parts washer (PW1) is subject to the requirements of 326 IAC 8-3-8. Pursuant to 326 IAC 8-3-8(a), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

D.4.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.3, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the parts washer. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
 - (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION E.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Coating Operation:

(a) Chain-on-edge #2 coating operation, consisting of the following:

- (1) One (1) adhesive application booth, identified as PB1 (Chain-on-edge #2 North, Station 130-1), installed in 2008, equipped with HVLP spray applicators, with nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB1) for particulate control, and exhausting to stack S3;
- (2) One (1) adhesive application booth, identified as PB2 (Chain-on-edge #2 West, Station 130-2), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB2) for particulate control, and exhausting to stack S4;
- (3) One (1) adhesive application booth, identified as PB3 (Chain-on-edge #2 South, Station 130-3), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB3) for particulate control, and exhausting to stack S5; and
- (4) Four (4) electric drying ovens, identified as Oven 1 and Oven 4, exhausting to Stack S6, and Oven 2 and Oven 3, exhausting to Stack S7.

PB1, PB2, and PB3 are considered affected facilities under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

(b) Chain-on-edge #1 coating operation, consisting of the following:

- (1) One (1) adhesive application booth, identified as PB4 (Chain-on-edge #1 West, Station 126-1), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB4) for particulate control, and exhausting to stack S8.
- (2) One (1) adhesive application booth, identified as PB5 (Chain-on-edge #1 South, Station 126-2), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB5) for particulate control, and exhausting to stack S9.
- (3) One (1) adhesive application booth, identified as PB14 (Chain-on-edge #1 East, Station 126-3), installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB14) for particulate control, and exhausting to stack S29.
- (4) Four (4) electric drying ovens, identified as Ovens 5 and 6, exhausting to stack S10, and Ovens 17 and 18, and exhausting to stack S30.

PB4, PB5, and PB14 are considered affected facilities under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

(c) One (1) adhesive application booth, identified as PB6 (Station 120), installed in 1993,

equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB6) for particulate control, exhausting to Stack S19.

PB6 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (d) Gear machine adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:
- (1) One (1) adhesive application booth, identified as PB7, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB7) for particulate control, and exhausting to stack S22
 - (2) One (1) adhesive application booth, identified as PB8, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB8) for particulate control, and exhausting to stack S22
 - (3) Two (2) drying ovens, identified as Oven 13 and Oven 14, and exhausting to stack S22.

PB7 and PB8 are considered affected facilities under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (f) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

PB10 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (g) One (1) adhesive application booth, identified as PB11 (Station 120), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.

PB11 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (h) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S26.

PB12 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (i) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S27.

PB13 is considered an affected facility under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

- (j) One (1) roll coater adhesive application system, identified as RC1 (Station 125), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to stack S18.

RC1 is considered an affected facility under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

- (k) One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to Stack S20.

DIP1 is considered an affected facility under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

- (l) One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.

SMDIP is considered an affected facility under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [40 CFR Part 63]

E.1.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR Part 63.3901, the Permittee shall comply with the applicable provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart Mmmm (4M).
- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.1.2 NESHAP for Surface Coating of Miscellaneous Metal Parts and Products [326 IAC 20-80] [40 CFR Part 63, Subpart Mmmm (4M)]

The Permittee shall comply with the following applicable provisions of 40 CFR Part 63, Subpart Mmmm (4M), which are incorporated by reference as 326 IAC 20-80, for the facilities listed in Section E.1. The full text of Subpart Mmmm (4M) may be found in Attachment A to this permit. Where the NESHAP provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (a) 40 CFR 63.3880

- (b) 40 CFR 63.3881(a)(1),(2), and (5), (b), (e)
- (c) 40 CFR 63.3882(a), (b), (e)
- (d) 40 CFR 63.3890(b)(1), (b)(4), (c)
- (e) 40 CFR 63.3891(a),(b)
- (f) 40 CFR 63.3892(a)
- (g) 40 CFR 63.3893(a)
- (h) 40 CFR 63.3900(a)(1)
- (i) 40 CFR 63.3901
- (j) 40 CFR 63.3910
- (k) 40 CFR 63.3920(a)(1) through (6)
- (l) 40 CFR 63.3930(a), (b), (c)(1) through (3), (d), (e), (f), (g), (h), (j)
- (m) 40 CFR 63.3931
- (n) 40 CFR 63.3940
- (o) 40 CFR 63.3941
- (p) 40 CFR 63.3942
- (q) 40 CFR 63.3950
- (r) 40 CFR 63.3951
- (s) 40 CFR 63.3952
- (t) 40 CFR 63.3980
- (u) 40 CFR 63.3981
- (v) Table 2 to Subpart M MMM
- (w) Table 3 to Subpart M MMM
- (x) Table 4 to Subpart M MMM

SECTION E.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Coating Operation:

(a) Chain-on-edge #2 coating operation, consisting of the following:

- (1) One (1) adhesive application booth, identified as PB1 (Chain-on-edge #2 North, Station 130-1), installed in 2008, equipped with HVLP spray applicators, with nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB1) for particulate control, and exhausting to stack S3;
- (2) One (1) adhesive application booth, identified as PB2 (Chain-on-edge #2 West, Station 130-2), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB2) for particulate control, and exhausting to stack S4;
- (3) One (1) adhesive application booth, identified as PB3 (Chain-on-edge #2 South, Station 130-3), installed in 2008, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB3) for particulate control, and exhausting to stack S5; and
- (4) Four (4) electric drying ovens, identified as Oven 1 and Oven 4, exhausting to Stack S6, and Oven 2 and Oven 3, exhausting to Stack S7.

PB1, PB2, and PB3 are considered affected facilities under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

(b) Chain-on-edge #1 coating operation, consisting of the following:

- (1) One (1) adhesive application booth, identified as PB4 (Chain-on-edge #1 West, Station 126-1), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB4) for particulate control, and exhausting to stack S8.
- (2) One (1) adhesive application booth, identified as PB5 (Chain-on-edge #1 South, Station 126-2), installed in 1994 and modified in 2009, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB5) for particulate control, and exhausting to stack S9.
- (3) One (1) adhesive application booth, identified as PB14 (Chain-on-edge #1 East, Station 126-3), installed in 2010, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB14) for particulate control, and exhausting to stack S29.
- (4) Four (4) electric drying ovens, identified as Ovens 5 and 6, exhausting to stack S10, and Ovens 17 and 18, and exhausting to stack S30.

PB4, PB5, and PB14 are considered affected facilities under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).

(c) One (1) adhesive application booth, identified as PB6 (Station 120), installed in 1993,

equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB6) for particulate control, exhausting to Stack S19.

PB6 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (d) Gear machine adhesive application operation (Station 127), reconstructed in 2005, consisting of the following:
- (1) One (1) adhesive application booth, identified as PB7, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB7) for particulate control, and exhausting to stack S22
 - (2) One (1) adhesive application booth, identified as PB8, equipped with HVLP spray applicators, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using dry filters (CPB8) for particulate control, and exhausting to stack S22
 - (3) Two (2) drying ovens, identified as Oven 13 and Oven 14, and exhausting to stack S22.

PB7 and PB8 are considered affected facilities under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (f) One (1) hand-spray booth, identified as PB10 (Station 119), installed in 2003, equipped with a HVLP spray applicator, with a nominal capacity of 2000 metal, plastic, or rubber parts per hour, using a dry filter (CPB10) for particulate control, and exhausting to stack S24.

PB10 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (g) One (1) adhesive application booth, identified as PB11 (Station 120), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB11) for particulate control, and exhausting to Stack S25.

PB11 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (h) One (1) adhesive application booth, identified as PB12 (Station 122), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB12) for particulate control, and exhausting to Stack S26.

PB12 is considered an affected facility under 40 CFR Part 63, Subpart M (4M) and 40 CFR Part 63, Subpart P (4P).

- (i) One (1) adhesive application booth, identified as PB13 (Station 123), installed in 1993, equipped with HVLP spray applicators, with a nominal capacity of 2,000 metal, plastic, or rubber parts per hour, using a dry filter (CPB13) for particulate control, and exhausting to Stack S27.

	<p>PB13 is considered an affected facility under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).</p>
(j)	<p>One (1) roll coater adhesive application system, identified as RC1 (Station 125), installed in 2003, with a nominal capacity of 850 metal, plastic, or rubber parts per hour, using no control, and exhausting to stack S18.</p> <p>RC1 is considered an affected facility under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).</p>
(k)	<p>One (1) gasket dip coating line, identified as DIP1 (Station 129), installed in 1995, with a nominal capacity of 1,000 metal, plastic, or rubber parts per hour, using no control, exhausting to Stack S20, and equipped with one (1) electric drying oven, identified as Oven 11, also exhausting to Stack S20.</p> <p>DIP1 is considered an affected facility under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).</p>
(l)	<p>One (1) hand dip coating line, identified as SMDIP (Station 116), installed in 2008, with a nominal capacity of 24,375 metal, plastic, or rubber parts per hour, using no control, and exhausting indoors.</p> <p>SMDIP is considered an affected facility under 40 CFR Part 63, Subpart Mmmm (4M) and 40 CFR Part 63, Subpart Pppp (4P).</p>
<p>(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)</p>	

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [40 CFR Part 63]

E.2.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

(a) Pursuant to 40 CFR Part 63.4501, the Permittee shall comply with the applicable provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 2 of 40 CFR Part 63, Subpart Pppp (4P).

(b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.2.2 NESHAP for Surface Coating of Miscellaneous Plastic Parts and Products [326 IAC 20-81] [40 CFR Part 63, Subpart Pppp (4P)]

The Permittee shall comply with the following applicable provisions of 40 CFR Part 63, Subpart Pppp (4P), which are incorporated by reference as 326 IAC 20-81, for the facilities listed in Section E.2. The full text of Subpart Pppp (4P) may be found in Attachment B to this permit. Where the NESHAP provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

(a) 40 CFR 63.4481(e)

SECTION E.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Boilers:

- (t) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a nominal heat input capacity of 14.7 million Btu per hour, and exhausting to stack S-BLR4.

BLR4 is considered an affected facility under 40 CFR 60, Subpart Dc and 40 CFR 63, Subpart DDDDD (5D).

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

New Source Performance Standards (NSPS) Requirements [40 CFR Part 60]

E.3.1 General Provisions Relating to NSPS [326 IAC 12-1] [40 CFR Part 60, Subpart A]

- (a) Pursuant to 40 CFR Part 60.1, the Permittee shall comply with the applicable provisions of 40 CFR Part 60, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 12-1, except as otherwise specified in 40 CFR Part 60, Subpart Dc.

- (b) Pursuant to 40 CFR 60.19, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.3.2 NSPS for Small Industrial-Commercial-Institutional Steam Generating Units [36 IAC 12-1] [40 CFR Part 60, Subpart Dc]

The Permittee shall comply with the following applicable provisions of 40 CFR Part 60, Subpart Dc, which are incorporated by reference as 326 IAC 12, for boiler BLR4. The full text of Subpart Dc may be found in Attachment C to this permit. Where the NSPS provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (a) 40 CFR 60.40c
(b) 40 CFR 60.41c
(c) 40 CFR 60.48c(a), (g), (i)

SECTION E.4 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Boilers:

- (s) One (1) natural gas-fired boiler, installed in 2007, identified as BLR3, with a nominal heat input capacity of 8.5 million Btu per hour, and exhausting to stack S-BLR3.

BLR3 is considered an affected facility under 40 CFR 63, Subpart DDDDD (5D).

- (t) One (1) natural gas-fired boiler, installed in 2008, identified as BLR4, with a nominal heat input capacity of 14.7 million Btu per hour, and exhausting to stack S-BLR4.

BLR4 is considered an affected facility under 40 CFR 60, Subpart Dc and 40 CFR 63, Subpart DDDDD (5D).

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [40 CFR Part 63]

E.4.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR Part 63.7565, the Permittee shall comply with the applicable provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Table 10 of 40 CFR Part 63, Subpart DDDDD (5D).

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.4.2 NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters [326 IAC 20-95] [40 CFR Part 63, Subpart DDDDD (5D)]

The Permittee shall comply with the following applicable provisions of 40 CFR Part 63, Subpart DDDDD (5D), which are incorporated by reference as 326 IAC 20-95, for the boilers BLR3 and BLR4. The full text of Subpart DDDDD (5D) may be found in Attachment D to this permit. Where the NESHAP provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (a) 40 CFR 63.7480
(b) 40 CFR 63.7485
(c) 40 CFR 63.7490(a)(1), (d)
(d) 40 CFR 63.7495(b), (d)
(e) 40 CFR 63.7499
(f) 40 CFR 63.7500(a)(1), (e), (f)
(g) 40 CFR 63.7501
(h) 40 CFR 63.7505(a)
(i) 40 CFR 63.7510(e)

- (j) 40 CFR 63.7515(d)
- (k) 40 CFR 63.7530(d), (e)
- (l) 40 CFR 63.7540(a)(10), (a)(11), (a)(13), (b), (d)
- (m) 40 CFR 63.7545(a), (b), (e)(1), (e)(8)(i through ii)
- (n) 40 CFR 63.7550(a), (b), (c)(1), (c)(5)(i through iv, xiv), (h)(3)
- (o) 40 CFR 63.7555(a), (i), (j)
- (p) 40 CFR 63.7560
- (q) 40 CFR 63.7565
- (r) 40 CFR 63.7570
- (s) 40 CFR 63.7575
- (t) Table 3 to Supart DDDDD
- (u) Table 9 to Supart DDDDD
- (v) Table 10 to Supart DDDDD

SECTION E.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (v) One (1) vapor degreaser, identified as VDG1, exhausting to Stack S1, installed in 1997, with an air-to-solvent interface of 15 square feet, with a nominal capacity of 28,000 automotive parts per hour or 2.7 pounds of trichloroethylene per hour, and exhausting to Stack S14.

Under 40 CFR 63, Subpart T, VDG1 is considered an affected facility.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

National Emission Standards for Hazardous Air Pollutants (NESHAP) Requirements [40 CFR Part 63]

E.5.1 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR Part 63, Subpart A]

- (a) Pursuant to 40 CFR Part 63.460, the Permittee shall comply with the applicable provisions of 40 CFR Part 63, Subpart A – General Provisions, which are incorporated by reference as 326 IAC 20-1-1, as specified in Appendix B of 40 CFR Part 63, Subpart T.

- (b) Pursuant to 40 CFR 63.10, the Permittee shall submit all required notifications and reports to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

E.5.2 NESHAP for Halogenated Solvent Cleaning [326 IAC 20-6] [40 CFR Part 63, Subpart T]

The Permittee shall comply with the following applicable provisions of 40 CFR Part 63, Subpart T, which are incorporated by reference as 326 IAC 20-6, for the vapor degreaser (VDG1). The full text of Subpart T may be found in Attachment E to this permit. Where the NESHAP provides options for compliance, nothing in this condition precludes the Permittee from choosing among those options or requires the Permittee to use a particular option:

- (a) 40 CFR 63.460(a), (b)
(b) 40 CFR 63.461
(c) 40 CFR 63.463(a), (b)(2), (d), (e), (f)
(d) 40 CFR 63.464(a), (b), (c)
(e) 40 CFR 63.465(a), (b), (c), (d), (e)
(f) 40 CFR 63.466(a), (b), (c), (f), (g)
(g) 40 CFR 63.467(a), (b), (c)
(h) 40 CFR 63.468(f), (g), (h), (i)
(i) 40 CFR 63.469
(j) 40 CFR 63.470
(k) 40 CFR 63.471(a), (b), (c), (d), (e), (h)
(l) Appendix A to Subpart T
(m) Appendix B to Subpart T

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Certification Letter
- Test Result (specify)
- Report (specify)
- Notification (specify)
- Affidavit (specify)
- Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: (317) 233-0178
Fax: (317) 233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002

This form consists of 2 pages

Page 1 of 2

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) daytime business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002
Facilities: Surface coating (PB1 through PB15, RC1, DIP1, and SMDIP), Banbury mixers (PMIX, SMIX, NEMIX, R&D MIX), RPRCSS rubber making mill (PMILL, SMILL, NEMILL, R&D MILL)
Parameter: VOC emissions
Limit: Less than 224 tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002
Facility: Chain-on-edge #2 North booth (PB1)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002
Facility: Chain-on-edge #2 West booth (PB2)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002
Facility: Chain-on-edge #2 South booth (PB3)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002
Facility: Gear machine booth (PB7)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002
Facility: Gear machine booth (PB8)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH**

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002
Facility: Roll coater adhesive application system (RC1)
Parameter: VOC input
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period

QUARTER :

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.

Deviation has been reported on:

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: BRC Rubber & Plastics, Inc.
Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
Part 70 Permit No.: T009-32966-00002

Months: _____ **to** _____ **Year:** _____

Page 1 of 2

<p>This report shall be submitted quarterly based on a calendar year. Proper notice submittal under Section B –Emergency Provisions satisfies the reporting requirements of paragraph (a) of Section C- General Reporting. Any deviation from the requirements of this permit, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p><input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p><input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD) for a Part 70 Minor Source
Modification and Significant Source Permit Modification**

Source Description and Location

Source Name:	BRC Rubber & Plastics, Inc.
Source Location:	623 West Monroe Street, Montpelier, Indiana 47359
County:	Blackford
SIC Code:	3069 (Fabricated Rubber Products, Not Elsewhere Classified)
Operation Permit No.:	T009-32966-00002
Operation Permit Issuance Date:	February 18, 2014
Minor Source Modification No.:	009-34796-00002
Significant Permit Modification No.:	009-34848-00002
Permit Reviewer:	Ryan Graunke

Existing Approvals

The source was issued Part 70 Operating Permit No. 009-32966-00002 on February 18, 2014. There have been no subsequent approvals issued.

County Attainment Status

The source is located in Blackford County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Unclassifiable or attainment effective July 20, 2012, for the 2008 8-hour ozone standard. ¹
PM _{2.5}	Unclassifiable or attainment effective April 5, 2005, for the annual PM _{2.5} standard.
PM _{2.5}	Unclassifiable or attainment effective December 13, 2009, for the 24-hour PM _{2.5} standard.
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Unclassifiable or attainment effective December 31, 2011.
¹ Unclassifiable or attainment effective October 18, 2000, for the 1-hour ozone standard which was revoked effective June 15, 2005.	

- (a) **Ozone Standards**
Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to ozone. Blackford County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM_{2.5}**
Blackford County has been classified as attainment for PM_{2.5}. Therefore, direct PM_{2.5}, SO₂, and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Other Criteria Pollutants

Blackford County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Source Status - Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed modification, after consideration of all enforceable limits established in the effective permits:

This PTE table is from the TSD to T009-32966-00002, issued on February 18, 2014.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Modification (tons/year)									
	PM	PM ₁₀ *	PM _{2.5} **	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Chain-on-edge #2 North booth (PB1)	0.94	0.94	0.94	-	-	224.0	-	-	1.99	1.60 - Xylene
Chain-on-edge #2 West booth (PB2)	0.94	0.94	0.94	-	-		-	-	1.99	1.60 - Xylene
Chain-on-edge #2 South booth (PB3)	0.94	0.94	0.94	-	-		-	-	1.99	1.60 - Xylene
Chain-on-edge #1 West booth (PB4)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Chain-on-edge #1 South booth (PB5)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Chain-on-edge #1 East booth (PB14)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB6)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Gear machine booth (PB7)	3.19	3.19	3.19	-	-		-	-	6.79	5.44 - Xylene
Gear machine booth (PB8)	3.19	3.19	3.19	-	-		-	-	6.79	5.44 - Xylene
Small chain-on-edge coating booth (PB9)	0.45	0.45	0.45	-	-		-	-	0.01	0.01 - Diethylene glycol monomethyl ether
Small chain-on-edge coating booth (PB15)	0.45	0.45	0.45	-	-		-	-	0.01	0.01 - Diethylene glycol monomethyl ether
Hand spray booth (PB10)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB11)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB12)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB13)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Roll coater adhesive application system (RC1)	-	-	-	-	-		-	-	13.57	10.89 - Methyl Isobutyl Ketone
Gasket dip coating line (DIP1)	-	-	-	-	-	-	-	7.29	7.26 - Methanol	

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Modification (tons/year)									
	PM	PM ₁₀ [*]	PM _{2.5} ^{**}	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Hand dip coating line (SMDIP)	-	-	-	-	-	-	-	-	-	1.16 - Xylene
Steel shot blaster (Blaster 1a)	43.80	43.80	43.80	-	-	-	-	-	-	-
Steel shot blaster (Blaster 2)	87.60	87.60	87.60	-	-	-	-	-	-	-
Grit blaster (Blaster 3)	39.42	39.42	39.42	-	-	-	-	-	-	-
Grit blaster (Blaster 4)	13.80	13.80	13.80	-	-	-	-	-	-	-
Grit blaster (Blaster 5)	13.80	13.80	13.80	-	-	-	-	-	-	-
Steel shot blaster (Blaster 6)	7.82	7.82	7.82	-	-	-	-	-	-	-
Natural gas boiler (BLR3)	0.07	0.28	0.28	0.02	3.65	0.20	3.07	4,407	0.07	0.07 - Hexane
Natural gas boiler (BLR4)	0.12	0.48	0.48	0.04	6.31	0.35	5.30	7,621	0.12	0.11 - Hexane
Flammable storage (FSTOR)	-	-	-	-	-	1.68	-	-	1.68	1.68 - Xylene
Vapor degreaser (VDG1)	-	-	-	-	-	12.00	-	-	12.00	12.00 - Trichloroethylene
Parts washer (PW1)	-	-	-	-	-	11.1	-	-	-	-
Primary Banbury mixer (PMIX)	14.18	14.18	14.18	-	-	-	-	-	-	-
Primary mill (PMILL)	2.02	2.02	2.02	-	-	-	-	-	-	-
Secondary Banbury Mixer (SMIX)	4.05	4.05	4.05	-	-	-	-	-	-	-
Secondary mill (SMILL)	0.58	0.58	0.58	-	-	-	-	-	-	-
Rubber coating operation (RCOAT)	0.66	0.66	0.66	-	-	-	-	-	-	-
Self-contained sand blaster (SBLAST)	2.24	1.57	1.57	-	-	-	-	-	-	-
Carbon silos (CSILO)	0.85	0.85	0.85	-	-	-	-	-	-	-
Automatic phosphate line (Phosline #1)	2.89	2.89	2.89	-	-	-	-	-	-	-
Manual phosphate line (Phosline #2)	3.35	3.35	3.35	-	-	-	-	-	0.56	0.56 - HCl
Chlorination tank	0.50	0.50	0.50	-	-	-	-	-	0.02	0.02 - HCl
Total PTE of Entire Source	249.9	249.8	249.8	0.06	9.96	249.3	8.37	12,028	60.3	33.8 - Xylene
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM10), not particulate matter (PM), is considered as a "regulated air pollutant".

**PM_{2.5} listed is direct PM_{2.5}.

- (a) This existing source is not a major stationary source, under PSD (326 IAC 2-2), because no PSD regulated pollutant, excluding GHGs, is emitted at a rate of two hundred fifty (250) tons per year or more and it is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(ff)(1).

- (b) The source wide GHG emissions are less than one hundred thousand (<100,000) tons of CO₂ equivalent (CO₂e) emissions per year. GHG emissions do not affect the source PSD status.
- (c) This existing source is a major source of HAPs, as defined in 40 CFR 63.2, because HAP emissions are greater than ten (10) tons per year for a single HAP and greater than twenty-five (25) tons per year for a combination of HAPs. Therefore, this source is a major source under Section 112 of the Clean Air Act (CAA).

Description of Proposed Modification

The Office of Air Quality (OAQ) has reviewed a modification application, submitted by BRC Rubber & Plastics, Inc. on August 5, 2014, relating to the replacement of an existing baghouse, construction of a new mixing and milling line, and construction of a new insignificant R&D mixing and milling line. The following is a list of the proposed emission units and pollution control devices:

- (a) Baghouse (CE16) for voluntary control on Primary Banbury mixer (PMIX) and Primary RPRCSS rubber making mill (PMILL), exhausting to Stack S16.

Note: The replacement of the baghouse does not result in any change to the PTE of PMIX and PMILL because the maximum capacity of these units will not change and the overall control efficiency of the new baghouse will be the same as the existing baghouse.
- (b) One (1) mixing and milling line, approved in 2014 for construction, with a nominal capacity of 3800 pounds of rubber ingredients per hour, and consisting of:
 - (1) One (1) Banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE; and
 - (2) One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.
- (c) One (1) R&D mixing and milling line, approved in 2014 for construction, with a nominal capacity of 6 pounds of rubber ingredients per hour, using no control, and exhausting indoors, and consisting of:
 - (1) One (1) small Banbury mixer, identified as R&DMIX; and
 - (2) One (1) 30-inch RPRCSS rubber making mill, identified as R&DMILL.

Enforcement Issues

There are no pending enforcement actions related to this modification.

Emission Calculations

See Appendix A of this Technical Support Document for detailed emission calculations.

Permit Level Determination – Part 70 Modification to an Existing Source

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emission unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, IDEM, or the appropriate local air pollution control agency.”

The following table is used to determine the appropriate permit level under 326 IAC 2-7-10.5. This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. If the control equipment has been determined to be integral, the table reflects the PTE after consideration of the integral control device.

Process/ Emission Unit	Potential To Emit of the Proposed Modification (tons/year)									
	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
NE Banbury Mixer (NEMIX)	14.98	14.98	14.98	-	-	4.84	-	-	2.00	1.71 - Carbon Disulfide
NE mill (NEMILL)	-	-	-	-	-	1.88	-	-	0.34	0.19 - Isophorone
R&D Banbury Mixer (R&DMIX)	0.02	0.02	0.02	-	-	0.008	-	-	0.0032	0.0027 - Carbon Disulfide
R&D mill (R&DMILL)	-	-	-	-	-	0.003	-	-	0.0005	0.0003 - Isophorone
Total PTE of Modification	15.0	15.0	15.0			6.73			2.34	1.71 - Carbon Disulfide

Appendix A of this TSD reflects the unrestricted potential emissions of the modification.

Approval to Construct:

This source modification is subject to 326 IAC 2-7-10.5(e)(1)(A) and (C) because it is a Minor Source Modification with PTE of PM, PM₁₀, and PM_{2.5} less than 25 tons per year and greater than 5 tons per year.

Approval to Operate:

Additionally, the modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12(d)(1), because it involves Title I changes to PSD minor limits and does not qualify as a minor permit modification or administrative amendment. Existing PSD minor limits have been adjusted to accommodate the emissions from the new units involved in this proposed modification.

Permit Level Determination – PSD

The table below summarizes the potential to emit of the entire source, with updated emissions shown as **bold** values and previous emissions shown as ~~strike through~~ values.

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Modification (tons/year)									
	PM	PM ₁₀ [*]	PM _{2.5} ^{**}	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Chain-on-edge #2 North booth (PB1)	0.94	0.94	0.94	-	-	224.0	-	-	1.99	1.60 - Xylene
Chain-on-edge #2 West booth (PB2)	0.94	0.94	0.94	-	-		-	-	1.99	1.60 - Xylene
Chain-on-edge #2 South booth (PB3)	0.94	0.94	0.94	-	-		-	-	1.99	1.60 - Xylene
Chain-on-edge #1 West booth (PB4)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Chain-on-edge #1 South booth (PB5)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Chain-on-edge #1 East booth (PB14)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB6)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Gear machine booth (PB7)	3.19	3.19	3.19	-	-		-	-	6.79	5.44 - Xylene
Gear machine booth (PB8)	3.19	3.19	3.19	-	-		-	-	6.79	5.44 - Xylene
Small chain-on-edge coating booth (PB9)	0.45	0.45	0.45	-	-		-	-	0.01	0.01 - Diethylene glycol monomethyl ether
Small chain-on-edge coating booth (PB15)	0.45	0.45	0.45	-	-		-	-	0.01	0.01 - Diethylene glycol monomethyl ether
Hand spray booth (PB10)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB11)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB12)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB13)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Roll coater adhesive application system (RC1)	-	-	-	-	-		-	-	13.57	10.89 - Methyl Isobutyl Ketone
Gasket dip coating line (DIP1)	-	-	-	-	-	-	-	7.29	7.26 - Methanol	
Hand dip coating line (SMDIP)	-	-	-	-	-	-	-	-	1.16 - Xylene	
Steel shot blaster (Blaster 1a) ¹	43.80 15.66	43.80 15.66	43.80 15.66	-	-	-	-	-	-	
Steel shot blaster (Blaster 2) ¹	87.60 62.02	87.60 62.02	87.60 62.02	-	-	-	-	-	-	
Grit blaster (Blaster 3) ¹	39.42 21.75	39.42 21.75	39.42 21.75	-	-	-	-	-	-	
Grit blaster (Blaster 4) ¹	43.80 10.13	43.80 10.13	43.80 10.13	-	-	-	-	-	-	
Grit blaster (Blaster 5) ¹	43.80 10.29	43.80 10.29	43.80 10.29	-	-	-	-	-	-	
Steel shot blaster (Blaster 6)	7.82	7.82	7.82	-	-	-	-	-	-	
Natural gas boiler (BLR3)	0.07	0.28	0.28	0.02	3.65	0.20	3.07	4,407	0.07	0.07 - Hexane
Natural gas boiler (BLR4)	0.12	0.48	0.48	0.04	6.31	0.35	5.30	7,621	0.12	0.11 - Hexane
Flammable storage (FSTOR)	-	-	-	-	-	1.68	-	-	1.68	1.68 - Xylene

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Modification (tons/year)									
	PM	PM ₁₀ [*]	PM _{2.5} ^{**}	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Vapor degreaser (VDG1)	-	-	-	-	-	12.00	-	-	12.00	12.00 - Trichloroethylene
Parts washer (PW1)	-	-	-	-	-	11.1	-	-	-	-
Primary Banbury mixer (PMIX) ²	44.18 13.80	44.18 13.80	44.18 13.80	-	-	***	-	-	1.84	1.57 - Carbon Disulfide
Primary mill (PMILL) ²	2.02 -	2.02 -	2.02 -	-	-	***	-	-	0.32	0.17 - Isophorone
Secondary Banbury Mixer (SMIX) ²	4.05 3.94	4.05 3.94	4.05 3.94	-	-	***	-	-	0.53	0.45 - Carbon Disulfide
Secondary mill (SMILL) ²	0.58 -	0.58 -	0.58 -	-	-	***	-	-	0.09	0.05 - Isophorone
NE Banbury Mixer (NEMIX)	14.98	14.98	14.98	-	-	***	-	-	2.00	1.71 - Carbon Disulfide
NE mill (NEMILL)	-	-	-	-	-	***	-	-	0.34	0.19 - Isophorone
R&D Banbury Mixer (R&DMIX)	0.02	0.02	0.02	-	-	***	-	-	0.0032	0.0027 - Carbon Disulfide
R&D mill (R&DMILL)	-	-	-	-	-	***	-	-	0.0005	0.0003 - Isophorone
Rubber coating operation (RCOAT)	0.66	0.66	0.66	-	-	-	-	-	-	-
Self-contained sand blaster (SBLAST)	2.24	1.57	1.57	-	-	-	-	-	-	-
Carbon silos (CSILO)	0.85	0.85	0.85	-	-	-	-	-	-	-
Automatic phosphate line (Phosline #1)	2.89	2.89	2.89	-	-	-	-	-	-	-
Manual phosphate line (Phosline #2)	3.35	3.35	3.35	-	-	-	-	-	0.56	0.56 - HCl
Chlorination tank	0.50	0.50	0.50	-	-	-	-	-	0.02	0.02 - HCl
Total PTE of Entire Source	249.9 183.3	249.8 183.1	249.8 183.1	0.06	9.96	249.3	8.37	12,028	60.3 66.9	33.8 - Xylene
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".

**PM_{2.5} listed is direct PM_{2.5}.

***VOC emissions from the mixing and milling lines are now included with surface coating booths under the 224 tons of VOC per year limit.

¹ PM, PM₁₀, and PM_{2.5} limits for Blasters 1a through 5 have been modified so that they do not exceed the limits to comply with 326 IAC 6-3-2.

² NE Mill and Mixer and R&D Mixer and Mill are new emission units in this modification. Emissions for the existing mixers and mills have be recalculated using AP-42 emission factors consistent with the new mixers and mills, since they are similar processes

The table below summarizes the potential to emit of the entire source after issuance of this modification, reflecting all limits, of the emission units. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted).

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Modification (tons/year)									
	PM	PM ₁₀ [*]	PM _{2.5} ^{**}	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Chain-on-edge #2 North booth (PB1)	0.94	0.94	0.94	-	-	224.0	-	-	1.99	1.60 - Xylene
Chain-on-edge #2 West booth (PB2)	0.94	0.94	0.94	-	-		-	-	1.99	1.60 - Xylene
Chain-on-edge #2 South booth (PB3)	0.94	0.94	0.94	-	-		-	-	1.99	1.60 - Xylene
Chain-on-edge #1 West booth (PB4)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Chain-on-edge #1 South booth (PB5)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Chain-on-edge #1 East booth (PB14)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB6)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Gear machine booth (PB7)	3.19	3.19	3.19	-	-		-	-	6.79	5.44 - Xylene
Gear machine booth (PB8)	3.19	3.19	3.19	-	-		-	-	6.79	5.44 - Xylene
Small chain-on-edge coating booth (PB9)	0.45	0.45	0.45	-	-		-	-	0.01	0.01 - Diethylene glycol monomethyl ether
Small chain-on-edge coating booth (PB15)	0.45	0.45	0.45	-	-		-	-	0.01	0.01 - Diethylene glycol monomethyl ether
Hand spray booth (PB10)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB11)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB12)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Adhesive booth (PB13)	0.32	0.32	0.32	-	-		-	-	0.69	0.55 - Xylene
Roll coater adhesive application system (RC1)	-	-	-	-	-		-	-	13.57	10.89 - Methyl Isobutyl Ketone
Gasket dip coating line (DIP1)	-	-	-	-	-	-	-	7.29	7.26 - Methanol	
Hand dip coating line (SMDIP)	-	-	-	-	-	-	-	-	1.16 - Xylene	
Steel shot blaster (Blaster 1a)	15.66	15.66	15.66	-	-	-	-	-	-	
Steel shot blaster (Blaster 2)	62.02	62.02	62.02	-	-	-	-	-	-	
Grit blaster (Blaster 3)	21.75	21.75	21.75	-	-	-	-	-	-	
Grit blaster (Blaster 4)	10.13	10.13	10.13	-	-	-	-	-	-	
Grit blaster (Blaster 5)	10.29	10.29	10.29	-	-	-	-	-	-	
Steel shot blaster (Blaster 6)	7.82	7.82	7.82	-	-	-	-	-	-	
Natural gas boiler (BLR3)	0.07	0.28	0.28	0.02	3.65	0.20	3.07	4,407	0.07	0.07 - Hexane
Natural gas boiler (BLR4)	0.12	0.48	0.48	0.04	6.31	0.35	5.30	7,621	0.12	0.11 - Hexane
Flammable storage (FSTOR)	-	-	-	-	-	1.68	-	-	1.68	1.68 - Xylene
Vapor degreaser (VDG1)	-	-	-	-	-	12.00	-	-	12.00	12.00 - Trichloroethylene
Parts washer (PW1)	-	-	-	-	-	11.1	-	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Modification (tons/year)									
	PM	PM ₁₀ [*]	PM _{2.5} ^{**}	SO ₂	NO _x	VOC	CO	GHGs	Total HAPs	Worst Single HAP
Primary Banbury mixer (PMIX)	13.80	13.80	13.80	-	-	***	-	-	1.84	1.57 - Carbon Disulfide
Primary mill (PMILL)	-	-	-	-	-	***	-	-	0.32	0.17 - Isophorone
Secondary Banbury Mixer (SMIX)	3.94	3.94	3.94	-	-	***	-	-	0.53	0.45 - Carbon Disulfide
Secondary mill (SMILL)	-	-	-	-	-	***	-	-	0.09	0.05 - Isophorone
NE Banbury Mixer (NEMIX)	14.98	14.98	14.98	-	-	***	-	-	2.00	1.71 - Carbon Disulfide
NE mill (NEMILL)	-	-	-	-	-	***	-	-	0.34	0.19 - Isophorone
R&D Banbury Mixer (R&DMIX)	0.02	0.02	0.02	-	-	***	-	-	0.0032	0.0027 - Carbon Disulfide
R&D mill (R&DMILL)	-	-	-	-	-	***	-	-	0.0005	0.0003 - Isophorone
Rubber coating operation (RCOAT)	0.66	0.66	0.66	-	-	-	-	-	-	-
Self-contained sand blaster (SBLAST)	2.24	1.57	1.57	-	-	-	-	-	-	-
Carbon silos (CSILO)	0.85	0.85	0.85	-	-	-	-	-	-	-
Automatic phosphate line (Phosline #1)	2.89	2.89	2.89	-	-	-	-	-	-	-
Manual phosphate line (Phosline #2)	3.35	3.35	3.35	-	-	-	-	-	0.56	0.56 - HCl
Chlorination tank	0.50	0.50	0.50	-	-	-	-	-	0.02	0.02 - HCl
Total PTE of Entire Source	183.3	183.1	183.1	0.06	9.96	249.3	8.37	12,028	66.9	33.8 - Xylene
Title V Major Source Thresholds	NA	100	100	100	100	100	100	100,000 CO ₂ e	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	100,000 CO ₂ e	NA	NA

*Under the Part 70 Permit program (40 CFR 70), particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), not particulate matter (PM), is considered as a "regulated air pollutant".
**PM_{2.5} listed is direct PM_{2.5}.
***VOC emissions from the mixing and milling lines are now included with surface coating booths under the 224 tons of VOC per year limit.

This modification to an existing minor PSD stationary source is not major because:

- (a) The emissions increase of each PSD regulated pollutant, excluding GHGs, are less than the PSD major source thresholds; and
- (b) The emissions increase of GHGs from this modification to an existing minor PSD source are less than one hundred thousand (100,000) tons of CO₂ equivalent (CO₂e) emissions per year

Therefore, pursuant to 326 IAC 2-2, the GHG emissions are not subject to regulation and the PSD requirements do not apply.

This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit PM, PM₁₀, PM_{2.5}, and VOC from the entire source will continue to be limited to less than the PSD major source threshold levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

In order for the source to remain a minor PSD source, the source has requested to make the following changes to existing PSD minor limits:

- (a) The existing VOC emission limit of 224.0 tons per year for the surface coating booths has been modified to include VOC emissions from the existing and new mixing and milling lines. This is a Title I change.
- (b) PM, PM₁₀, and PM_{2.5} emission limits for Blasters 1a through 5 limits have been re-evaluated and cannot be greater than the limits to comply with 326 IAC 6-3-2. New emission limits are as follows:

Abrasive blaster	PM Limit (pounds per hour)	PM ₁₀ Limit (pounds per hour)	PM _{2.5} Limit (pounds per hour)
Blaster 1a	3.57	3.57	3.57
Blaster 2	14.16	14.16	14.16
Blaster 3	4.97	4.97	4.97
Blaster 4	2.31	2.31	2.31
Blaster 5	2.35	2.35	2.35

These adjusted limits will accommodate the unlimited PTE of PM, PM₁₀, and PM_{2.5} of the new Banbury mixers. These are Title I changes.

Compliance with these limits, combined with the potential to emit PM, PM₁₀, PM_{2.5}, and VOC from all other emission units at this source, shall limit the source-wide total potential to emit of each of these pollutants to less than 250 tons per twelve (12) consecutive month period and shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

Federal Rule Applicability Determination

The following federal rules are applicable to the source due to this modification:

New Source Performance Standards (NSPS)

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) applicable to this proposed modification.

Compliance Assurance Monitoring (CAM)

- (c) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is applicable to new or modified emission units that involve a pollutant-specific emission unit and meet the following criteria:
 - (1) has a potential to emit before controls equal to or greater than the Part 70 major source threshold for the pollutant involved;
 - (2) is subject to an emission limitation or standard for that pollutant; and
 - (3) uses a control device, as defined in 40 CFR 64.1, to comply with that emission limitation or standard.

CAM is not applicable to any of the proposed units because they do not have potential to emit equal to or greater than the Part 70 major source thresholds and are not required to use a control device to comply with any emission limitation or standard.

State Rule Applicability Determination

The following state rules are applicable to the source due to the modification:

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
PSD applicability is discussed under the Permit Level Determination – PSD and Emission Offset section.
- (b) 326 IAC 2-4.1-1 (New Source Toxics Control)
The operation of the new mixing and and milling lines will emit less than ten (10) tons per year for a single HAP and less than twenty-five (25) tons per year for a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.
- (c) 326 IAC 2-6 (Emission Reporting)
This source, not located in Lake, Porter, or LaPorte County, is subject to 326 IAC 2-6 (Emission Reporting) because it is required to have an operating permit pursuant to 326 IAC 2-7 (Part 70). The potential to emit of VOC and PM₁₀ is less than 250 tons per year; and the potential to emit of CO, NO_x, and SO₂ is less than 2,500 tons per year. Therefore, pursuant to 326 IAC 2-6-3(a)(2), triennial reporting is required. An emission statement shall be submitted in accordance with the compliance schedule in 326 IAC 2-6-3 by July 1, 2017, and every three (3) years thereafter. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4.
- (d) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
 - (1) Pursuant to 326 IAC 6-3-2(e)(3), the allowable particulate emission rate from the NE Banbury mixer shall not exceed 6.30 pounds per hour when operating at process weight rates of 1.9 tons per hour, respectively.

The pounds per hour limitations were calculated by the following:

Interpolation of the data for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 * P^{0.67}$$

Where: E = rate of emission in pounds per hour; and

P = process weight rate in tons per hour = (Material throughput (lb/hr) / 2000 lb/ton

The PTE before control of the NE mixer is significantly less than the emission limit. Therefore, the baghouse is not required to operate while this unit is in operation, and it is considered a voluntary control device.

- (2) Pursuant to 326 IAC 6-3-1(b)(14), the insignificant mixer is exempt from 326 IAC 6-3-2 because it has potential PM emissions less than five hundred fifty-one thousandths (0.551) pounds per hour.
 - (3) The RPRCSS rubber making mills are exempt from 326 IAC 6-3-2 because they do not have any particulate emissions. Existing mills (PMILL and SMILL), which were previously subject to 326 IAC 6-3-2, are now exempt due to the revised methodology for calculating PTE using AP-42 emission factors.
- (e) 326 IAC 8-1-6 (VOC Rules: General Reduction Requirements for New Facilities)
The unlimited potential to emit of the new mixing and milling lines are each less than twenty-five (25) tons per year. Therefore, the units are not subject to 326 IAC 8-1-6.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no changes to existing compliance monitoring or testing conditions as a result of this modification.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. T009-32966-00002. Deleted language appears as ~~strike throughs~~ and new language appears in **bold**:

- (a) Emission unit descriptions for the replacement PMILL and PMIX baghouse, NE Mixer and Mill, and insignificant R&D Mixer and Mill have been added to Sections A.2 and A.3, respectively, and D.5. Additionally, the descriptions of the existing mixers (PMIX and SMIX) and mills (PMILL and SMILL) have been modified to be consistent with the new mixers and mills and to show that the units operate as a single line.
- (b) VOC emission limit in Condition D.1.1 have been modified to incorporate VOC emissions from the mixing and milling units. Compliance determination and reporting requirements in Conditions D.1.6 have been modified accordingly. Section D.5 and respective requirements has been combined into Section D.1 for clarity because the units share a common VOC limit.
- (c) After a re-evaluation of the rule, PSD minor limits for PM, PM₁₀, and PM_{2.5} emission limits in Conditions D.2.1 for Blasters cannot exceed the limits to comply 326 IAC 6-3-2. In addition, the throughput used to calculate the 326 IAC 6-3-2 limit in Condition D.2.2 for Blasters 3, 4, and 5 were incorrect. These have now been corrected.
- (d) Requirements for the parts washer (PW1) to comply with 326 IAC 8-3-8 have been added to the permit. These are new applicable requirements effective January 1, 2015.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(14)]

This stationary source consists of the following emission units and pollution control devices:

...

- ~~(x) One (1) primary Banbury mixer, identified as PMIX, with a nominal capacity of 3500 pounds of rubber ingredients, using a baghouse (CE16) for voluntary particulate control, and exhausting to Stack S16;~~

Rubber Mixing and Milling Lines:

- (x) One (1) Primary mixing and milling line, with a nominal capacity of 3500 pounds of**

rubber ingredients per hour, and consisting of:

- (1) **One (1) Banbury mixer, identified as PMIX, using a baghouse (CE16) for voluntary control, which will be replaced in 2014, exhausting to Stack S16; and**
- (2) **One (1) RPRCSS rubber making mill, identified as PMILL, using no control, and exhausting indoors.**
- (y) **One (1) Secondary mixing and milling line, with a nominal capacity of 1000 pounds of rubber ingredients per hour, and consisting of:**
 - (1) **One (1) Banbury mixer, identified as SMIX, using a baghouse (CE17) for voluntary control, exhausting to Stack S17; and**
 - (2) **One (1) RPRCSS rubber making mill, identified as SMILL, using no control, and exhausting indoors.**
- (z) **One (1) mixing and milling line, approved in 2014 for construction, with a nominal capacity of 3800 pounds of rubber ingredients per hour, and consisting of:**
 - (1) **One (1) Banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE; and**
 - (2) **One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(14)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- ~~(a) One (1) secondary Banbury mixer, identified as SMIX, with a nominal capacity of 1000 pounds of rubber ingredients, using a baghouse (CE16) for voluntary particulate control, and exhausting to Stack S16.~~
- ~~(b) One (1) RPRCSS rubber making/primary mill, identified as PMILL, with a nominal capacity of 3500 pounds of rubber ingredients, using a baghouse (CE17) for voluntary particulate control, and exhausting to Stack S17;~~
- ~~(c) One (1) RPRCSS rubber making/secondary mill, identified as SMIL, with a nominal capacity of 1000 pounds of rubber ingredients, using a baghouse (CE17) for voluntary particulate control, and exhausting to Stack S17;~~
- (a) **One (1) R&D mixing and milling line, approved in 2014 for construction, with a nominal capacity of 6 pounds of rubber ingredients per hour, using no control, and exhausting indoors, and consisting of:**
 - (1) **One (1) small Banbury mixer, identified as R&DMIX; and**
 - (2) **One (1) 30-inch RPRCSS rubber making mill, identified as R&DMILL.**
- (db) One (1) rubber dip coating operation, identified as RCOAT, with a nominal capacity of 3500 pounds of rubber per hour and 49,280 pounds of clay coating per year, using no control, and exhausting indoors.
- (ec) One (1) self-contained sandblaster, identified as SBLAST, with a nominal throughput rate of 12.5 pounds of sand per day, using a built-in dust collector for particulate control, and exhausting indoors.

- (fd) Three (3) carbon silos, identified as CSILOS, with a nominal throughput of 1,700,000 pounds of carbon per year.
- (ge) One (1) automatic phosphate line, identified as Phosline #1, installed in January 2003, using no control, exhausting through Stack S11, and consisting of the following:
 - (1) One (1) alkaline soak tank with a nominal capacity of 800 gallons;
 - (2) One (1) acid pickle tank with a nominal capacity of 400 gallons;
 - (3) One (1) phosphate tank with a nominal capacity of 400 gallons;
 - (4) One (1) sealer tank with a nominal capacity of 400 gallons;
 - (5) Four (4) rinse tanks each with a nominal capacity of 400 gallons;
- (hf) One (1) manual phosphate line, identified as Phosline #2, using no control, exhausting through Stack S12, and consisting of the following:
 - (1) One (1) alkaline soak tank with a nominal capacity of 400 gallons;
 - (2) One (1) alkaline stripper tank with a nominal capacity of 400 gallons;
 - (3) One (1) hydrochloric acid pickle tank with a nominal capacity of 400 gallons;
 - (4) One (1) phosphate tank with a nominal capacity of 400 gallons;
 - (5) One (1) sealer tank with a nominal capacity of 400 gallons;
 - (6) One (1) alumabrite tank with a nominal capacity of 400 gallons;
- (ig) One (1) chlorination tank, installed in 2012, using no control, and exhausting indoors
- (jh) Four (4) electric ovens, installed in June 2004 and 2005, identified as:
 - (1) Three (3) heating ovens, identified as Oven 7, Oven 8 and Oven 9, exhausted to Stacks S13, S14, and S15, respectively.
 - (2) One (1) drying oven, identified as Oven 10, exhausted to Stack S16.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

<p>Emissions Unit Description:</p> <p>...</p> <p>Rubber Mixing and Milling Lines:</p> <ul style="list-style-type: none">(x) One (1) Primary mixing and milling line, with a nominal capacity of 3500 pounds of rubber ingredients per hour, and consisting of:<ul style="list-style-type: none">(1) One (1) Banbury mixer, identified as PMIX, using a baghouse (CE16) for voluntary control, which will be replaced in 2014, exhausting to Stack S16; and(2) One (1) RPRCSS rubber making mill, identified as PMILL, using no control, and exhausting indoors.(y) One (1) Secondary mixing and milling line, with a nominal capacity of 1000 pounds of rubber ingredients per hour, and consisting of:

- (1) One (1) Banbury mixer, identified as SMIX, using a baghouse (CE17) for voluntary control, exhausting to Stack S17; and
 - (2) One (1) RPRCSS rubber making mill, identified as SMILL, using no control, and exhausting indoors.
 - (z) One (1) mixing and milling line, approved in 2014 for construction, with a nominal capacity of 3800 pounds of rubber ingredients per hour, and consisting of:
 - (1) One (1) Banbury mixer, identified as NEMIX, using a baghouse (NE) for voluntary control, exhausting to Stack NE; and
 - (2) One (1) RPRCSS rubber making mill, identified as NEMILL, using no control, and exhausting indoors.
- Insignificant:**
- (a) One (1) R&D mixing and milling line, approved in 2014 for construction, with a nominal capacity of 6 pounds of rubber ingredients per hour, using no control, and exhausting indoors, and consisting of:
 - (1) One (1) small Banbury mixer, identified as R&DMIX; and
 - (2) One (1) 30-inch RPRCSS rubber making mill, identified as R&DMILL.
- (The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 PSD Minor Limits [326 IAC 2-2]: Volatile Organic Compound (VOC)

In order to render 326 IAC 2-2 not applicable, the total VOC input, including coatings, dilution solvents, and cleaning solvents, to all surface coating units listed in Section D.1 **and total input of rubber ingredients to all mixing and milling units shall be limited such that the VOC emissions** shall not exceed 224 tons of VOC per twelve consecutive month period, with compliance determined at the end of each month.

D.1.4 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the following units shall not exceed the pounds per hour limit listed in the table below:

Emission unit	Maximum process weight rate (tons per hour)	Particulate emission limit (pounds per hour)
PMIX	1.75	5.97
SMIX	0.5	2.58
NEMIX	1.9	6.30

The pounds per hour limitations were calculated by the following:

Interpolation of the data for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 * P^{0.67}$$

Where: E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

D.1.45 Preventive Maintenance Plan [326 IAC 2-7-5(12)]

...

D.1.6 Volatile Organic Compound (VOC) Emissions Determination [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC emission limitation contained in Condition D.1.1 shall be determined as follows:

- (a) Monthly VOC emission shall be calculated with the following equation:

$$\text{VOC} = \text{VOC}_{\text{mix}} + \text{VOC}_{\text{mill}} + \text{VOC}_{\text{coat}}$$

Where:

VOC_{mix} = VOC emissions from Banbury mixers (tons/month)

VOC_{mill} = VOC emissions from RPRCSS rubber making mills (tons/month)

VOC_{coat} = VOC emissions from Banbury mixers (tons/month)

For the equations below, the maximum VOC emission factors shall be from the most recent version of the U.S. EPA's AP-42, Chapter 4.12

- (b) VOC emissions (VOC_{mix}) from the Banbury mixers (PMIX, SMIX, NEMIX, and R&D MIX) - shall be calculated using the following equation:

$$\text{VOC}_{\text{mix}} \text{ (tons/month)} = (\text{R}_{\text{mix}} * \text{MEF}_{\text{mix}})/2000$$

Where:

R_{mix} = pounds of rubber mixed per month; and

MEF_{mix} = 2.91×10^{-4} pounds of VOC per pound of rubber or the maximum VOC emission factor for the compounds mixed that month

- (c) VOC emissions from the RPRCSS rubber making mills (PMILL, SMILL, NEMILL, and R&D MILL) shall be calculated using the following equation:

$$\text{VOC}_{\text{mill}} \text{ (tons/month)} = (\text{R}_{\text{mill}} * \text{MEF}_{\text{mill}})/2000$$

Where:

R_{mill} = pounds of rubber milled per month; and

MEF_{mill} = 1.13×10^{-4} pounds of VOC per pound of rubber or the maximum VOC emission factor for the compounds milled that month

- (d) VOC emissions (VOC_{coat} , tons/month) from all other surface coating units, including coatings, dilution solvents, and cleaning solvents, shall be the VOC input, which shall be calculated as determined in Condition D.1.7.

D.1.57 Volatile Organic Compound (VOC) Emissions Determination [326 IAC 8-1-2] [326 IAC 8-1-4]

...

D.1.68 Surface Coating Particulate Monitoring

...

D.1.79 Record Keeping Requirements

- (a) To document the compliance status with Condition D.1.1, the Permittee shall maintain the following records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.1.1.

- (1) The amount by weight and type of rubber compounds mixed and milled each month.

(2) Monthly calculations demonstrating the weight of the VOC emitted for each compliance period.

- (ab) To document the compliance status with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.
 ...
- (bc) To document the compliance status with Condition D.1.78, the Permittee shall maintain a log of weekly overspray observations and daily filter inspections and monthly overspray inspections of the sides of the building and the nearby ground.
- (ed) Section C - General Record Keeping Requirements contains the Permittee's obligation with regard to the records required by this condition.

D.1.810 Reporting Requirements

...

D.2.1 PSD Minor Limits [326 IAC 2-2]: PM, PM₁₀, and PM_{2.5}

In order to render 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable, the Permittee shall comply with the following emission limits for the following abrasive blasters:

Abrasive blaster	PM Limit (pounds per hour)	PM ₁₀ Limit (pounds per hour)	PM _{2.5} Limit (pounds per hour)
Blaster 1a	40.00 3.57	40.00 3.57	40.00 3.57
Blaster 2	20.00 14.16	20.00 14.16	20.00 14.16
Blaster 3	9.00 4.97	9.00 4.97	9.00 4.97
Blaster 4	3.15 2.31	3.15 2.31	3.15 2.31
Blaster 5	3.15 2.35	3.15 2.35	3.15 2.35

D.2.2 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the following abrasive blasters shall not exceed the pounds per hour limit listed in the table below:

Abrasive blaster	Maximum process weight rate (tons per hour)	Particulate emission limit (pounds per hour)
Blaster 1a	0.82	3.57
Blaster 2	6.36	14.16
Blaster 3	3.69 1.33	9.84 4.97
Blaster 4	1.21 0.43	4.67 2.31
Blaster 5	1.22 0.44	4.69 2.35
Blaster 6	1.07	4.29

...

SECTION D.4 EMISSIONS UNIT OPERATION CONDITIONS

...

D.4.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-8]

Effective January 1, 2015, the parts washer (PW1) is subject to the requirements of 326 IAC 8-3-8. Pursuant to 326 IAC 8-3-8(a), the Permittee shall not operate a cold cleaner degreaser with a solvent that has a VOC composite partial vapor pressure that exceeds one (1) millimeter of mercury (nineteen-thousandths (0.019) pound per square inch) measured at twenty (20) degrees Celsius (sixty eight (68) degrees Fahrenheit).

D.4.4 Record Keeping Requirements

- (a) To document the compliance status with Condition D.4.3, on and after January 1, 2015, the Permittee shall maintain the following records for each purchase of solvent used in the parts washer. These records shall be retained on-site or accessible electronically for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.
- (1) The name and address of the solvent supplier.
 - (2) The date of purchase (or invoice/bill date of contract servicer indicating service date).
 - (3) The type of solvent purchased.
 - (4) The total volume of the solvent purchased
 - (5) The true vapor pressure of the solvent measured in millimeters of mercury at twenty (20) degrees Celsius (sixty-eight (68) degrees Fahrenheit).
- (b) Section C - General Record Keeping Requirements contains the Permittee's obligations with regard to the records required by this condition.

SECTION D.5 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

- (x) One (1) primary Banbury mixer, identified as PMIX, with a nominal capacity of 3500 pounds of rubber ingredients, using a baghouse (CE16) for voluntary particulate control, and exhausting to Stack S16;

Insignificant activities:

- (a) One (1) secondary Banbury mixer, identified as SMIX, with a nominal capacity of 1000 pounds of rubber ingredients, using a baghouse (CE16) for voluntary particulate control, and exhausting to Stack S16.
- (b) One (1) RPRCSS rubber making/primary mill, identified as PMILL, with a nominal capacity of 3500 pounds of rubber ingredients, using a baghouse (CE17) for voluntary particulate control, and exhausting to Stack S17;
- (c) One (1) RPRCSS rubber making/secondary mill, identified as SMIL, with a nominal capacity of 1000 pounds of rubber ingredients, using a baghouse (CE17) for voluntary particulate control, and exhausting to Stack S17;

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Emission Limits [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate emissions from the following units shall not exceed the pounds per hour limit listed in the table below:

Abrasive blaster	Maximum process weight rate (tons per hour)	Particulate emission limit (pounds per hour)
PMIX	1.75	5.97
SMIX	0.5	2.58
PMILL	1.75	5.97
SMILL	0.5	2.58

The pounds per hour limitations were calculated by the following:

Interpolation of the data for process weight rates up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 * P^{0.67}$$

Where: E = rate of emission in pounds per hour; and
 P = process weight rate in tons per hour

~~D.5.2 Preventive Maintenance Plan [326 IAC 2-7-5(12)]~~

~~A Preventive Maintenance Plan is required for these facilities and any control devices. Section B – Preventive Maintenance Plan contains the Permittee’s obligation with regard to the preventive maintenance plan required by this condition.~~

...

Part 70 Quarterly Report

Source Name: BRC Rubber & Plastics, Inc.
 Source Address: 623 West Monroe Street, Montpelier, Indiana 47359
 Part 70 Permit No.: T009-32966-00002
 Facilities: **Surface coating (PB1 through PB15, RC1, DIP1, and SMDIP), Banbury mixers (PMIX, SMIX, NEMIX, R&DMIX), RPRCSS rubber making mill (PMILL, SMILL, NEMILL, R&DMILL)**
 Parameter: VOC input emissions
 Limit: Less than 224 tons per twelve (12) consecutive month period

Conclusion and Recommendation

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 009-34796-00002 and Significant Permit Modification No. 009-34848-00002. The staff recommend to the Commissioner that this Part 70 Minor Source and Significant Permit Modification be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Ryan Graunke at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-5374 or toll free at 1-800-451-6027 extension (4-5374).
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM Permit Guide on the Internet at: <http://www.in.gov/idem/5881.htm>; and the Citizens' Guide to IDEM on the Internet at: <http://www.in.gov/idem/6900.htm>.

**Appendix A: Emissions Calculations
Source summary (Unlimited PTE)**

Company Name: BRC Rubber & Plastics, Inc.

Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359

Permit No.: T009-32966-00002

Minor Source Modification No.: 009-34769-00002

Significant Permit Modification No.: 009-34848-00002

Reviewer: Ryan Graunke

Unlimited PTE (ton/yr)

Emission Unit	Emission Unit ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHG as CO ₂ e	Total HAPs	Single HAPs	
Chain-on-edge #2 North booth	PB1	0.94	0.94	0.94	-	-	27.20	-	-	1.99	1.60	Xylene
Chain-on-edge #2 West booth	PB2	0.94	0.94	0.94	-	-	27.20	-	-	1.99	1.60	Xylene
Chain-on-edge #2 South booth	PB3	0.94	0.94	0.94	-	-	27.20	-	-	1.99	1.60	Xylene
Chain-on-edge #1 West booth	PB4	0.32	0.32	0.32	-	-	5.21	-	-	0.69	0.55	Xylene
Chain-on-edge #1 South booth	PB5	0.32	0.32	0.32	-	-	5.21	-	-	0.69	0.55	Xylene
Chain-on-edge #1 East booth	PB14	0.32	0.32	0.32	-	-	5.21	-	-	0.69	0.55	Xylene
Adhesive application booth	PB6	0.32	0.32	0.32	-	-	5.21	-	-	0.69	0.55	Xylene
Gear machine booth	PB7	3.19	3.19	3.19	-	-	51.4	-	-	6.79	5.44	Xylene
Gear machine booth	PB8	3.19	3.19	3.19	-	-	51.4	-	-	6.79	5.44	Xylene
Small chain-on-edge booth	PB9	0.45	0.45	0.45	-	-	1.29	-	-	0.01	0.01	Diethylene glycol monomethyl ether
Small chain-on-edge booth	PB15	0.45	0.45	0.45	-	-	1.29	-	-	0.01	0.01	Diethylene glycol monomethyl ether
Hand spray booth	PB10	0.32	0.32	0.32	-	-	5.21	-	-	0.69	0.55	Xylene
Adhesive application booth	PB11	0.32	0.32	0.32	-	-	5.21	-	-	0.69	0.55	Xylene
Adhesive application booth	PB12	0.32	0.32	0.32	-	-	5.21	-	-	0.69	0.55	Xylene
Adhesive application booth	PB13	0.32	0.32	0.32	-	-	5.21	-	-	0.69	0.55	Xylene
Roll coater adhesive application system	RC1	-	-	-	-	-	102.9	-	-	13.57	10.89	Methyl Isobutyl Ketone
Gasket dip coating line	DIP1	-	-	-	-	-	11.41	-	-	7.29	7.26	Methanol
Hand dip coating line	SMDIP	-	-	-	-	-	8.66	-	-	1.45	1.16	Xylene
Grit blaster	Blaster 1a	109.8	109.8	109.8	-	-	-	-	-	-	-	-
Steel shot blaster	Blaster 2	214.4	184.4	184.4	-	-	-	-	-	-	-	-
Grit blaster	Blaster 3	101.3	70.9	70.9	-	-	-	-	-	-	-	-
Grit blaster	Blaster 4	33.8	23.6	23.6	-	-	-	-	-	-	-	-
Grit blaster	Blaster 5	33.8	23.6	23.6	-	-	-	-	-	-	-	-
Steel shot blaster	Blaster 6	7.82	7.82	7.82	-	-	-	-	-	-	-	-
Natural gas boiler	BLR3	0.07	0.28	0.28	0.02	3.65	0.20	3.07	4,407	0.07	0.07	Hexane
Natural gas boiler	BLR4	0.12	0.48	0.48	0.04	6.31	0.35	5.30	7,621	0.12	0.11	Hexane
Flammable storage	FSTOR	-	-	-	-	-	1.68	-	-	1.68	1.68	Xylene
Vapor degreaser	VDG1	-	-	-	-	-	12.00	-	-	12.00	12.00	Trichloroethylene
Parts washer	PW1	-	-	-	-	-	11.10	-	-	-	-	-
Primary Banbury Mixer	PMIX	13.80	13.80	13.80	-	-	4.46	-	-	1.84	1.57	Carbon Disulfide
Primary Mill	PMILL	-	-	-	-	-	1.73	-	-	0.32	0.17	Isophorone
Secondary Banbury Mixer	SMIX	3.94	3.94	3.94	-	-	1.27	-	-	0.53	0.45	Carbon Disulfide
Secondary Mill	SMILL	-	-	-	-	-	0.49	-	-	0.09	0.05	Isophorone
NE Banbury Mixer	NEMIX	14.98	14.98	14.98	-	-	4.84	-	-	2.00	1.71	Carbon Disulfide
NE Mill	NEMILL	-	-	-	-	-	1.88	-	-	0.34	0.19	Isophorone
R&D Banbury Mixer	N/A	0.02	0.02	0.02	-	-	0.008	-	-	0.0032	0.0027	Carbon Disulfide
R&D Mill	N/A	-	-	-	-	-	0.003	-	-	0.0005	0.0003	Isophorone
Rubber coating operation	RCOAT	0.66	0.66	0.66	-	-	-	-	-	-	-	-
Self-contained sand blaster	SBLAST	2.24	1.57	1.57	-	-	-	-	-	-	-	-
Carbon silos	CSILO	0.85	0.85	0.85	-	-	-	-	-	-	-	-
Automatic phosphate line	PHOSLINE #1	2.89	2.89	2.89	-	-	-	-	-	-	-	-
Manual phosphate line	PHOSLINE #2	3.35	3.35	3.35	-	-	-	-	-	0.56	0.56	HCl
Chlorination tank	N/A	0.50	0.50	0.50	-	-	-	-	-	0.02	0.02	HCl
Total		557.0	475.7	475.7	0.06	9.96	391.7	8.37	12,028	66.9	33.8	Xylene

Appendix A: Emissions Calculations
Source summary (Limited PTE)

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002

Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002

Reviewer: Ryan Graunke

Limited PTE (ton/yr)

Emission Unit	Emission Unit ID	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOC	CO	GHG as CO ₂ e	Total HAPs	Single HAPs	
Chain-on-edge #2 North booth	PB1	0.94	0.94	0.94	-	-	224.0	-	-	1.99	1.60	Xylene
Chain-on-edge #2 West booth	PB2	0.94	0.94	0.94	-	-		-	-	1.99	1.60	Xylene
Chain-on-edge #2 South booth	PB3	0.94	0.94	0.94	-	-		-	-	1.99	1.60	Xylene
Chain-on-edge #1 West booth	PB4	0.32	0.32	0.32	-	-		-	-	0.69	0.55	Xylene
Chain-on-edge #1 South booth	PB5	0.32	0.32	0.32	-	-		-	-	0.69	0.55	Xylene
Chain-on-edge #1 East booth	PB14	0.32	0.32	0.32	-	-		-	-	0.69	0.55	Xylene
Adhesive application booth	PB6	0.32	0.32	0.32	-	-		-	-	0.69	0.55	Xylene
Gear machine booth	PB7	3.19	3.19	3.19	-	-		-	-	6.79	5.44	Xylene
Gear machine booth	PB8	3.19	3.19	3.19	-	-		-	-	6.79	5.44	Xylene
Small chain-on-edge booth	PB9	0.45	0.45	0.45	-	-		-	-	0.01	0.01	Diethylene glycol monomethyl ether
Small chain-on-edge booth	PB15	0.45	0.45	0.45	-	-		-	-	0.01	0.01	Diethylene glycol monomethyl ether
Hand spray booth	PB10	0.32	0.32	0.32	-	-		-	-	0.69	0.55	Xylene
Adhesive application booth	PB11	0.32	0.32	0.32	-	-		-	-	0.69	0.55	Xylene
Adhesive application booth	PB12	0.32	0.32	0.32	-	-		-	-	0.69	0.55	Xylene
Adhesive application booth	PB13	0.32	0.32	0.32	-	-		-	-	0.69	0.55	Xylene
Roll coater adhesive application system	RC1	-	-	-	-	-		-	-	13.57	10.89	Methyl Isobutyl Ketone
Gasket dip coating line	DIP1	-	-	-	-	-		-	-	7.29	7.26	Methanol
Hand dip coating line	SMDIP	-	-	-	-	-		-	-	1.45	1.16	Xylene
Grit blaster	Blaster 1a	15.66	15.66	15.66	-	-		-	-	-	-	-
Steel shot blaster	Blaster 2	62.02	62.02	62.02	-	-	-	-	-	-	-	
Grit blaster	Blaster 3	21.75	21.75	21.75	-	-	-	-	-	-	-	
Grit blaster	Blaster 4	10.13	10.13	10.13	-	-	-	-	-	-	-	
Grit blaster	Blaster 5	10.29	10.29	10.29	-	-	-	-	-	-	-	
Steel shot blaster	Blaster 6	7.82	7.82	7.82	-	-	-	-	-	-	-	
Natural gas boiler	BLR3	0.07	0.28	0.28	0.02	3.65	0.20	3.07	4,407	0.07	0.07	Hexane
Natural gas boiler	BLR4	0.12	0.48	0.48	0.04	6.31	0.35	5.30	7,621	0.12	0.11	Hexane
Flammable storage	FSTOR	-	-	-	-	-	1.68	-	-	1.68	1.68	Xylene
Vapor degreaser	VDG1	-	-	-	-	-	12.00	-	-	12.00	12.00	Trichloroethylene
Parts washer	PW1	-	-	-	-	-	11.10	-	-	-	-	-
Primary Banbury Mixer	PMIX	13.80	13.80	13.80	-	-	*	-	-	1.84	1.57	Carbon Disulfide
Primary Mill	PMILL	-	-	-	-	-	*	-	-	0.32	0.17	Isophorone
Secondary Banbury Mixer	SMIX	3.94	3.94	3.94	-	-	*	-	-	0.53	0.45	Carbon Disulfide
Secondary Mill	SMILL	-	-	-	-	-	*	-	-	0.09	0.05	Isophorone
NE Banbury Mixer	NEMIX	14.98	14.98	14.98	-	-	*	-	-	2.00	1.71	Carbon Disulfide
NE Mill	NEMILL	-	-	-	-	-	*	-	-	0.34	0.19	Isophorone
R&D Banbury Mixer	N/A	0.02	0.02	0.02	-	-	*	-	-	0.0032	0.0027	Carbon Disulfide
R&D Mill	N/A	-	-	-	-	-	*	-	-	0.0005	0.0003	Isophorone
Rubber coating operation	RCOAT	0.66	0.66	0.66	-	-	-	-	-	-	-	-
Self-contained sand blaster	SBLAST	2.24	1.57	1.57	-	-	-	-	-	-	-	-
Carbon silos	CSILO	0.85	0.85	0.85	-	-	-	-	-	-	-	-
Automatic phosphate line	PHOSLINE #1	2.89	2.89	2.89	-	-	-	-	-	-	-	-
Manual phosphate line	PHOSLINE #2	3.35	3.35	3.35	-	-	-	-	-	0.56	0.56	HCl
Chlorination tank	N/A	0.50	0.50	0.50	-	-	-	-	-	0.02	0.02	HCl
Total		183.3	183.1	183.1	0.06	9.96	249.3	8.37	12,028	66.9	33.82	Xylene

* VOC emissions from the mixing and milling lines are included with surface coating booths under the 224 tons of VOC per year limit.

**Appendix A: Emissions Calculations
Source summary (HAPs)**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Xylene	Toluene	Ethyl benzene	1,1,2-Trichloroethane	Trichloroethylene	Methyl isobutyl ketone	Diethylene glycol monomethyl ether	Methanol	HCl	Carbon Disulfide	Isophorone	Hexane	Total HAPs
Chain-on-edge #2 North booth	PB1	1.597	0.014	0.377	0.003	-	-	-	-	-	-	-	-	1.99
Chain-on-edge #2 West booth	PB2	1.597	0.014	0.377	0.003	-	-	-	-	-	-	-	-	1.99
Chain-on-edge #2 South booth	PB3	1.597	0.014	0.377	0.003	-	-	-	-	-	-	-	-	1.99
Chain-on-edge #1 West booth	PB4	0.551	0.005	0.130	0.001	-	-	-	-	-	-	-	-	0.69
Chain-on-edge #1 South booth	PB5	0.551	0.005	0.130	0.001	-	-	-	-	-	-	-	-	0.69
Chain-on-edge #1 East booth	PB14	0.551	0.005	0.130	0.001	-	-	-	-	-	-	-	-	0.69
Adhesive application booth	PB6	0.551	0.005	0.130	0.001	-	-	-	-	-	-	-	-	0.69
Gear machine booth	PB7	5.444	0.048	1.284	0.011	-	-	-	-	-	-	-	-	6.79
Gear machine booth	PB8	5.444	0.048	1.284	0.011	-	-	-	-	-	-	-	-	6.79
Small chain-on-edge booth	PB9	-	-	-	-	-	-	0.006	-	-	-	-	-	0.01
Small chain-on-edge booth	PB15	-	-	-	-	-	-	0.006	-	-	-	-	-	0.01
Hand spray booth	PB10	0.551	0.005	0.130	0.001	-	-	-	-	-	-	-	-	0.69
Adhesive application booth	PB11	0.551	0.005	0.130	0.001	-	-	-	-	-	-	-	-	0.69
Adhesive application booth	PB12	0.551	0.005	0.130	0.001	-	-	-	-	-	-	-	-	0.69
Adhesive application booth	PB13	0.551	0.005	0.130	0.001	-	-	-	-	-	-	-	-	0.69
Roll coater adhesive application system	RC1	10.889	0.096	2.568	0.021	-	-	-	-	-	-	-	-	13.57
Gasket dip coating line	DIP1	-	-	-	-	-	0.029	-	7.257	-	-	-	-	7.29
Hand dip coating line	SMDIP	1.163	0.010	0.274	0.002	-	-	-	-	-	-	-	-	1.45
Grit blaster	Blaster 1a	-	-	-	-	-	-	-	-	-	-	-	-	-
Steel shot blaster	Blaster 2	-	-	-	-	-	-	-	-	-	-	-	-	-
Grit blaster	Blaster 3	-	-	-	-	-	-	-	-	-	-	-	-	-
Grit blaster	Blaster 4	-	-	-	-	-	-	-	-	-	-	-	-	-
Grit blaster	Blaster 5	-	-	-	-	-	-	-	-	-	-	-	-	-
Steel shot blaster	Blaster 6	-	-	-	-	-	-	-	-	-	-	-	-	-
Natural gas boiler	BLR3	-	0.0001	-	-	-	-	-	0.066	-	-	-	0.066	0.07
Natural gas boiler	BLR4	-	0.0002	-	-	-	-	-	0.114	-	-	-	0.114	0.12
Flammable storage	FSTOR	1.68	-	-	-	-	-	-	-	-	-	-	-	1.68
Vapor degreaser	VDG1	-	-	-	-	12.00	-	-	-	-	-	-	-	12.00
Parts washer	PW1	-	-	-	-	-	-	-	-	-	-	-	-	-
Primary Banbury mixer	PMIX	-	-	-	-	-	-	-	-	-	1.57	-	-	1.84
Primary mill	PMILL	-	-	-	-	-	-	-	-	-	0.001	0.17	-	0.32
Secondary Banbury Mixer	SMIX	-	-	-	-	-	-	-	-	-	0.45	-	-	0.53
Secondary mill	SMILL	-	-	-	-	-	-	-	-	-	0.0004	0.05	-	0.09
NE Banbury Mixer	NEMIX	-	-	-	-	-	-	-	-	-	1.71	-	-	2.00
NE mill	NEMILL	-	-	-	-	-	-	-	-	-	0.0016	0.19	-	0.34
R&D Banbury Mixer	N/A	-	-	-	-	-	-	-	-	-	0.0027	-	-	0.0032
R&D mill	N/A	-	-	-	-	-	-	-	-	-	0.000003	0.0003	-	0.0005
Rubber coating operation	RCOAT	-	-	-	-	-	-	-	-	-	-	-	-	-
Self-contained sand blaster	SBLAST	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon silos	CSILO	-	-	-	-	-	-	-	-	-	-	-	-	-
Automatic phosphate line	PHOSLINE #1	-	-	-	-	-	-	-	-	-	-	-	-	-
Manual phosphate line	PHOSLINE #2	-	-	-	-	-	-	-	-	0.56	-	-	-	0.00
Chlorination tank	N/A	-	-	-	-	-	-	-	-	0.02	-	-	-	0.56
Total		33.8	0.3	7.6	0.06	12.0	0.029	0.012	7.4	0.6			0.2	66.9

**Appendix A: Emissions Calculations
Worst-case coatings**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Material	Density (lb/gal)	Weight % Volatile (Water & VOC)	Weight % Water & Exempt	Weight % VOC	Volume % Water & Exempt	Volume % Solids	VOC content (lb/gal coating)	VOC content (lb/gal coating less water)	VOC content (lb/gal coating solids)	HAPS							
										Xylene	Toluene	Ethyl benzene	1,1,2-Trichloroethane	Methyl isobutyl ketone	Formaldehyde	Diethylene glycol monomethyl ether	Methanol
Under/Primer Coat - Worst Case for VOC																	
Chemlok 207LH	7.60	80.42%	0%	80.42%	0.0%	9.95%	6.11	6.11	61.43	-	-	-	-	3.00%	0.10%	-	-
MPK - Solvent	6.76	100.0%	19.5%	80.50%	15.8%	0.0%	5.44	6.46	N/A	-	-	-	-	10.00%	-	-	-
Top/Adhesive Coat - Worst Case for PM and HAPs (Adhesive without the solvent is only coating used in SMDIP)																	
Chemlok 6411LH	8.20	76.06%	0%	76.06%	0.0%	13.55%	6.24	6.24	46.03	10.22%	0.09%	2.41%	0.02%	-	-	-	-
TBA - Solvent	7.19	100.0%	100%	0.00%	100.0%	0.0%	0.00	N/A	0.00	-	-	-	-	-	-	-	-
Lubricant - Only coating used in PB 9 and PB15																	
TW-052	8.80	69.0%	46.71%	22.29%	49.28%	No data	1.96	3.87	No data	-	-	-	-	-	-	0.10%	-
Adhesive Coat 1 - Worst Case for HAPs (DIP1)																	
Chemlok 607	6.93	88.59%	8.30%	80.29%	6.90%	8.78%	5.56	5.98	63.37	-	-	-	-	-	-	-	78.10%
Ethanol - solvent	6.65	100.00%	2.51%	97.49%	2.0%	0.0%	6.48	6.62	N/A	-	-	-	-	1.00%	-	-	5.00%
Adhesive Coat 2 - Worst Case for VOC (DIP1)																	
Chemlok 6411LH	8.20	76.06%	0%	76.06%	0.0%	13.6%	6.24	6.24	46.03	10.22%	0.09%	2.41%	0.02%	-	-	-	-
n-butyl - solvent	7.34	100.00%	0%	100.00%	0.0%	0.0%	7.34	7.34	N/A	-	-	-	-	-	-	-	-

Notes:

These calculations are based on additional information and MSDSs/Product Data Sheets provided by the source on August 8, 2013.

MPK = Methyl n-Propyl Ketone

TBA = Tert butyl acetate, which is an exempt VOC pursuant to 40 CFR 51.100.

Methodology:

Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or provided in MSDS

Weight % Volatile (Water & VOC) (for lubricant) = 1 - Weight % solids (31%, as provided in MSDS)

Weight % VOC = Weight % Volatile (Water & Organics) - Weight % Water & Exempt

Weight % VOC (for lubricant and ethanol) = VOC content (lb/gal coating) / Density (lb/gal)

Weight % Water & Exempt (for lubricant and ethanol) = Weight % Volatile (Water & Organics) - Weight % VOC

Volume % Water = Weight % Water * Density (lb/gal) / Density of water (8.34 lb/gal)

Maximum usage (gal/hr) = Usage rate (gal/unit) * Maximum throughput (unit/hr)

VOC content (lb/gal coating) = Density (lb/gal) * Weight % VOC

VOC content (lb/gal coating) (for lubricant) = VOC content (g/L, as provided in MSDS) * 1 kg/1000 g * 2.20462 lb/kg * 3.7854 L/gal

VOC content (lb/gal coating less coating) = Density (lb/gal) * Weight % VOC / (1-Volume % Water)

VOC content (lb/gal coating solids) = Density (lb/gal) * Weight % VOC / Volume % Solids

**Appendix A: Emissions Calculations
Surface Coating**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Emission Unit	Unit ID	Transfer Efficiency	Maximum throughput (parts/hr)	Coating usage		Solvent usage		Usage (gal/day)	PTE of HAPs (ton/yr)										
				Usage rate (gal/part)	Maximum usage (gal/hr)	Usage rate (gal/unit)	Maximum usage (gal/hr)		PTE of VOC (lb/hr)	PTE of VOC (lb/day)	PTE of VOC (ton/yr)	PTE of PM (ton/yr)	Xylene	Toluene	Ethyl benzene	1,1,2-Trichloroethane	Methyl isobutyl ketone	Diethylene glycol monomethyl ether	Methanol
Chain-on-edge #2 North	PB1	75%	2000	0.000218	0.44	0.000327	0.65	26.11	6.21	149.03	27.20	0.94	1.597	0.014	0.377	0.003	-	-	-
Chain-on-edge #2 West	PB2	75%	2000	0.000218	0.44	0.000327	0.65	26.11	6.21	149.03	27.20	0.94	1.597	0.014	0.377	0.003	-	-	-
Chain-on-edge #2 South	PB3	75%	2000	0.000218	0.44	0.000327	0.65	26.11	6.21	149.03	27.20	0.94	1.597	0.014	0.377	0.003	-	-	-
Chain-on-edge #1 West	PB4	75%	2000	*	0.15	*	0.05	4.80	1.19	28.53	5.21	0.32	0.551	0.005	0.130	0.001	-	-	-
Chain-on-edge #1 South	PB5	75%	2000	*	0.15	*	0.05	4.80	1.19	28.53	5.21	0.32	0.551	0.005	0.130	0.001	-	-	-
Chain-on-edge #1 East	PB14	75%	2000	*	0.15	*	0.05	4.80	1.19	28.53	5.21	0.32	0.551	0.005	0.130	0.001	-	-	-
Adhesive application booth	PB6	75%	2000	*	0.15	*	0.05	4.80	1.19	28.53	5.21	0.32	0.551	0.005	0.130	0.001	-	-	-
Gear machine booth	PB7	75%	850	0.001745	1.48	0.000580	0.49	47.43	11.75	281.92	51.45	3.19	5.444	0.048	1.284	0.011	-	-	-
Gear machine booth	PB8	75%	850	0.001745	1.48	0.000580	0.49	47.43	11.75	281.92	51.45	3.19	5.444	0.048	1.284	0.011	-	-	-
Small chain-on-edge booth	PB9	75%	1500	*	0.15	-	-	3.60	0.29	7.06	1.29	0.45	-	-	-	-	-	0.006	-
Small chain-on-edge booth	PB15	75%	1500	*	0.15	-	-	3.60	0.29	7.06	1.29	0.45	-	-	-	-	-	0.006	-
Hand spray booth	PB10	75%	2000	*	0.15	*	0.05	4.80	1.19	28.53	5.21	0.32	0.551	0.005	0.130	0.001	-	-	-
Adhesive application booth	PB11	75%	2000	*	0.15	*	0.05	4.80	1.19	28.53	5.21	0.32	0.551	0.005	0.130	0.001	-	-	-
Adhesive application booth	PB12	75%	2000	*	0.15	*	0.05	4.80	1.19	28.53	5.21	0.32	0.551	0.005	0.130	0.001	-	-	-
Adhesive application booth	PB13	75%	2000	*	0.15	*	0.05	4.80	1.19	28.53	5.21	0.32	0.551	0.005	0.130	0.001	-	-	-
Roll coater adhesive application system	RC1	100%	850	0.003490	2.97	0.001160	0.99	94.86	23.49	563.83	102.90	-	10.889	0.096	2.568	0.021	-	-	-
Gasket dip coating line	DIP1	100%	1000	*	0.30	*	0.10	9.60	2.60	62.52	11.41	-	-	-	-	-	0.029	-	7.257
Hand dip coating line	SMDIP	100%	24,375	0.000013	0.32	-	-	7.61	1.98	47.43	8.66	-	1.163	0.010	0.274	0.002	-	-	-

Notes:

These calculations are based on additional information provided by the source on August 8, 2013.
 These paint booths have switched from high pressure sprayers to "Turbospray" HVLP, which increased transfer efficiency to 75%.
 It was conservatively assumed that coating usage rate decreased the previous usage rates by half.
 Roll and dip coating has 100% transfer efficiency and no potential particulate emissions.
 PM=PM₁₀=PM_{2.5}
 *PTE of these units were calculated using the maximum usage (gal of coating/hr) as provided by the source, rather than the maximum throughput (parts/hr) and usage rate (gal/part)

Methodology:

Usage (gal/day) = (Usage rate of coating (gal/hr) + Usage rate of solvent (gal/hr)) * 24 hrs/day
 PTE of VOC (lb/hr) = Σ (Maximum usage (gal/hr) * VOC content (lb/gal coating)) (total for coating + solvent, if applicable)
 PTE of VOC (lb/day) = PTE of VOC (lb/hr) * 24 hrs/day
 PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
 PTE of PM (ton/yr) = Maximum usage (unit/hr) * Density (lb/gal) * (1-Weight % volatile) * (1-Transfer efficiency) * 8760 hrs/yr * 1 ton/2000 lbs (for coating as solvents have no solids)
 PTE of HAP (ton/yr) = Σ (Maximum usage (unit/hr) * Density (lb/gal) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs) (total for coating + solvent, if applicable)

**Appendix A: Emissions Calculations
Blaster 1a**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Emission Unit	Control Efficiency	Grain loading rate (grains/acf)	Air flow rate (acfm)	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (ton/yr)	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (ton/yr)
Blaster 1a	99%	0.015	1950	25.1	109.8	0.251	1.10

Notes:

These calculations are derived from Appendix A to the TSD for SSM #009-30007-00002 and SPM #009-30098-00002
 PM=PM₁₀=PM_{2.5}

Methodology:

Controlled PTE of PM (lb/hr) = Grain loading rate (grains/acf) * Air flow rate (acfm) * 60 min/hr * 1 lb/7000 grains
 Controlled PTE of PM (ton/yr) = Controlled PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
 Uncontrolled PTE = Controlled PTE / (1 - Control efficiency)

IAC 6-3-2 Limit

Emission Unit	Material throughput (lb/hr)	Steel shot throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)	Control efficiency needed
Blaster 1a	1600	30	0.82	3.57	85.7%

IAC 2-2 (PSD) Limit

Limited PTE of PM (lb/hr)	Limited PTE of PM (ton/yr)	Control efficiency needed
3.57	15.66	85.7%

Notes:

PSD limits cannot be greater than the limits to comply with 325 IAC 6-3-2.
 For PSD limits, PM = PM₁₀ = PM_{2.5}

Methodology:

Process weight rate (ton/hr) = (Material throughput (lb/hr) + Steel shot throughput (lb/hr)) / 2000 lb/ton
 Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)
 Limited PTE (ton/yr) = Limited PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
 Control efficiency needed = 1 - (Limited emissions (lb/hr) / Unlimited PTE (lb/hr))

**Appendix A: Emissions Calculations
Blasters 2-5**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Table 1 - Emission Factors for Abrasives

Abrasive	lb PM/lb abrasive	lb PM ₁₀ /lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	0.70

Table 2 - Density of Abrasives (lb/ft³)

Abrasive	Density (lb/ft ³)
Al oxides	160
Sand	99
Steel	487

Table 3 - Sand Flow Rate Through Nozzle (lb/hr)

Flow rate of sand through a blasting nozzle as a function of nozzle pressure and internal diameter

Nozzle Type (diameter)	ID (in)	Nozzle Pressure (psig)							
		30	40	50	60	70	80	90	100
No. 2 (1/8 inch)	0.125	28	35	42	49	55	63	70	77
No. 3 (3/16 inch)	0.1875	65	80	94	107	122	135	149	165
No. 4 (1/4 inch)	0.25	109	138	168	195	221	255	280	309
No. 5 (5/16 inch)	0.3125	205	247	292	354	377	420	462	507
No. 6 (3/8 inch)	0.375	285	355	417	477	540	600	657	720
No. 7 (7/16 inch)	0.4375	385	472	560	645	755	820	905	940
No. 8 (1/2 inch)	0.5	503	615	725	835	945	1050	1160	1265
No. 10 (5/8 inch)	0.625	820	990	1170	1336	1510	1680	1850	2030
No. 12 (3/4 inch)	0.75	1140	1420	1670	1915	2160	2400	2630	2880
No. 16 (1 inch)	1	2030	2460	2900	3340	3780	4200	4640	5060

Adjusted Flow Rates for Steel Shot

Emission Unit	Density of sand (lb/ft ³) (Table 2)	ID of sandblasting nozzle (in) (Table 3)	Sand flow rate (lb/hr) (Table 3)	ID of actual nozzle (in)	Density of Al oxide (lb/ft ³) (Table 2)	Flow rate of abrasive (lb/hr)
Blaster 2*	-	-	-	-	-	12240.0
Blaster 3	99	0.375	477	0.375	160	770.9
Blaster 4**	99	0.375	477	0.375	160	770.9
Blaster 5	99	0.375	477	0.375	160	770.9

Uncontrolled PTE

Emission Unit	Number of nozzles	Fraction of time of wet blasting	Flow rate (lb/hr)	Emission factors		Uncontrolled PTE - PM		Uncontrolled PTE - PM ₁₀	
				PM (lb/lb abrasive)	PM ₁₀ (lb/lb PM)	lb/hr	ton/yr	lb/hr	ton/yr
Blaster 2	1	0%	12240.0	0.004	0.86	49.0	214.4	42.1	184.4
Blaster 3	3	0%	770.9	0.010	0.70	23.1	101.3	16.2	70.9
Blaster 4**	1	0%	770.9	0.010	0.70	7.71	33.8	5.4	23.6
Blaster 5	1	0%	770.9	0.010	0.70	7.71	33.8	5.4	23.6

Controlled PTE

Emission Unit	Control Efficiency	Controlled PTE - PM		Controlled PTE - PM ₁₀	
		lb/hr	ton/yr	lb/hr	ton/yr
Blaster 2	99%	0.49	2.14	0.42	1.84
Blaster 3	99%	0.23	1.01	0.16	0.71
Blaster 4**	99%	0.08	0.34	0.05	0.24
Blaster 5	99%	0.08	0.34	0.05	0.24

Notes:

These calculations are derived from Appendix A to the TSD for TVOP Renewal (T009-19529-00002) and additional information provided by the source on August 8, 2013.

ID = internal diameter of nozzle

*Flow rate of Blaster 2 based on manufacturer's specifications of 17 lbs of steel shot per 5 seconds.

Blasters 3, 4, and 5 use aluminum oxide as abrasive.

**Calculations for Blaster 4 are derived from Appendix A to the TSD for SSM #009-19573-00002 and SPM #009-19963-00002, then identified as Ruemblin Hand Blaster

Emission factors from STAPPA/ALAPCO "Air Quality Permits", Vol. 1, Section 3 "Abrasive Blasting" (1991 edition)

PM₁₀=PM_{2.5}**Methodology:**Flow rate of Al oxide (lb/hr) = Sand flow rate (lb/hr) * (ID of sandblasting nozzle / ID of actual nozzle)² * (Density of Al oxide / Density of sand)

Uncontrolled PTE of PM (lb/hr) = Flow rate (lb/hr) * PM emission factor (lb/lb abrasive) * (1 - Fraction of time of wet blasting/200) * Number of nozzles

Uncontrolled PTE of PM₁₀ (lb/hr) = Uncontrolled PTE of PM (lb/hr) * PM₁₀ emission factor (lb/lb PM)

Uncontrolled PTE (lb/day) = Uncontrolled PTE (lb/hr) * 24 hrs/day

Uncontrolled PTE (ton/yr) = Uncontrolled PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Controlled PTE = Uncontrolled PTE * (1 - Control efficiency)

326 IAC 6-3-2 Limit

Emission Unit	Material throughput (lb/hr)	Abrasive throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)	Control efficiency needed
Blaster 2	477.3	12240.0	6.36	14.16	71.1%
Blaster 3	350	2312.7	1.33	4.97	78.5%
Blaster 4	80	770.9	0.43	2.31	70.0%
Blaster 5	100	770.9	0.44	2.35	69.5%

326 IAC 2-2 (PSD) Limit

Limited PTE of PM (lb/hr)	Limited PTE of PM (ton/yr)	Control efficiency needed
14.16	62.02	71.1%
4.97	21.75	78.5%
2.31	10.13	70.0%
2.35	10.29	69.5%

Notes:

PSD limits cannot be greater than the limits to comply with 325 IAC 6-3-2.

For PSD limits, PM = PM₁₀ = PM_{2.5}**Methodology:**

Abrasive throughput (lb/hr) = Flow rate (lb/hr) * Number of nozzles

Process weight rate (ton/hr) = (Material throughput (lb/hr) + Abrasive throughput (lb/hr)) / 2000 lb/ton

Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)

Limited PTE (ton/yr) = Limited PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

Control efficiency needed = 1 - (Limited emissions (lb/hr) / Unlimited PTE (lb/hr))

**Appendix A: Emissions Calculations
Blaster 6**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Particulate collected (lb/wk)	Normal operating hours (hr/wk)	Particulate collection rate (lb/hr)	Control efficiency	Uncontrolled PTE of PM (lb/hr)	Uncontrolled PTE of PM (ton/yr)	Controlled PTE of PM (lb/hr)	Controlled PTE of PM (ton/yr)
175	100	1.75	98.0%	1.79	7.82	0.036	0.156

Notes:
 These calculations are derived from Appendix A to the TSD for SSM #009-30007-00002 and SPM #009-30098-00002
 PM=PM₁₀=PM_{2.5}

Methodology:
 Particulate collection rate (lb/hr) = Particulate collected (lb/wk) / Normal operating hours (hr/wk)
 Uncontrolled PTE (lb/hr) = Particulate collection rate (lb/hr) / Control efficiency
 Uncontrolled PTE of PM (ton/yr) = Uncontrolled PTE of PM (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs
 Controlled PTE = Uncontrolled PTE * (1 - Control efficiency)

IAC 6-3-2 Limit

Emission Unit	Total throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)
Blaster 6	2142.9	1.07	4.29

Notes:
 Total throughput (lb/hr) based on 250 lbs. max load and minimum load time of 7 minutes.
 This throughput is for both steel shot and parts being blasted.

Methodology:
 Process weight rate (ton/hr) = Total throughput (lb/hr) / 2000 lb/ton
 Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)

**Appendix A: Emissions Calculations
Boilers (BLR3 and BLR4)**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Emission unit	Emission Unit ID	Number of Units	Heat Input Capacity Each (MMBtu/hr/unit)	Total Potential Throughput (MMCF/yr)
Boiler	BLR3	1	8.50	73.0
Boiler	BLR4	1	14.70	126.2
Totals:			23.200	126.2

	Pollutant						
	PM*	PM ₁₀ *	Direct PM _{2.5} *	SO ₂	NO _x	VOC	CO
Emission Factor (lb/MMCF)	1.9	7.6	7.6	0.6	100.0	5.5	84.0
Potential Emission (tons/yr) (BLR3)	0.1	0.3	0.3	0.0	3.7	0.2	3.1
Potential Emissions (tons/yr) (BLR4)	0.1	0.5	0.5	0.0	6.3	0.3	5.3

*PM emission factor is filterable PM only. PM₁₀ emission factor is filterable and condensable PM₁₀ combined.
PM_{2.5} emission factor is filterable and condensable PM_{2.5} combined.

	HAPs - Organics				
	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission (tons/yr) (BLR3)	7.665E-05	4.380E-05	2.738E-03	6.570E-02	1.241E-04
Potential Emissions (tons/yr) (BLR4)	1.326E-04	7.575E-05	4.734E-03	1.136E-01	2.146E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission (tons/yr) (BLR3)	1.825E-05	4.015E-05	5.110E-05	1.387E-05	7.665E-05
Potential Emissions (tons/yr) (BLR4)	3.156E-05	6.944E-05	8.837E-05	2.399E-05	1.326E-04
Total HAPs (BLR3):					6.888E-02
Total HAPs (BLR4):					1.191E-01

	Greenhouse Gas		
	CO ₂	CH ₄	N ₂ O
Emission Factor (lb/MMCF)	120,000	2.3	2.2
Potential Emission (tons/yr) (BLR3)	4,380	0.1	0.1
Potential Emission (tons/yr) (BLR4)	7,575	0.1	0.1
Summed Potential Emissions (tons/yr) (BLR3)	4,380		
Summed Potential Emissions (tons/yr) (BLR4)	7,575		
CO ₂ e Total (tons/yr) (BLR3)	4,407		
CO ₂ e Total (tons/yr) (BLR4)	7,621		

Notes:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

The five highest organic and metal HAPs emission factors are provided above. Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Global Warming Potentials (GWP) from Table A-1 of 40 CFR Part 98 Subpart A.

Methodology:

Total Heat Input Capacity (MMBtu/hr) = \sum (Heat Input Capacity Each (MMBtu/hr/unit) * Number of Units)

Potential Throughput (MMCF/yr) = Heat Input Capacity Each (MMBtu/hr) * Number of Units * 8,760 hrs/yr * High Heat Value (1 MMCF/1,020 MMBtu)

Potential Emission (tons/yr) = Total Max Throughput (MMCF/yr) * Emission Factor (lb/MMCF) * 1 ton/2000 lbs

CO₂e (tons/yr) = CO₂ Potential Emission (tons/yr) * CO₂ GWP (1) + CH₄ Potential Emission (tons/yr) * CH₄ GWP (21) + N₂O Potential Emission (tons/yr) * N₂O GWP (310).

**Appendix A: Emissions Calculations
Flammable Liquid Storage (FSTOR)**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Assumed loss from dispensing	1%
Assumed loss from standing	0.01%
Assumed loss from mixing	0.1%

Emission Unit	Emission Unit ID	Volume dispensed (gal/day)	Volume dispensed (gal/hr)	Average density (lb/gal)	Max storage (gal)	Max throughput (gal/yr)	Mixing rate (gal/day)	Dispensing losses (lb/yr)	Standing losses (lb/yr)	Mixing losses (lb/yr)	PTE of VOC/xylene (ton/yr)
Flammable Liquid Storage	FSTOR	60	10	8	3050	13000	550	1752	10.4	1606	1.68

Notes:

These calculations are derived from Appendix A to the TSD for TVOP Renewal (T009-19529-00002).
Potential VOC emissions based on engineering judgment are from storage of 55 gallon drums.
Sealed drums of adhesives, solvents and all coatings are stored in FSTOR.
Drums being used (up to 10 at a time) are mixed continuously, but sealed.
Operating at 8 hr/day, 5-10 gallons of liquid are dispensed twice daily, which takes approximately 15 minutes.
Operating at 24 hr/day, 60 gallons of liquid are potentially dispensed per day.
All losses are assumed to be VOC and xylene, as a worst case.

Methodology:

Mixing rate (gal/day) = 10 drums/day * 55 gal/drum
Dispensing losses (lb/yr) = Volume dispensed (gal/day) * Assumed loss from dispensing * Average density (lb/gal) * 365 day/yr
Standing losses (lb/yr) = Max throughput (gal/yr) * Assumed loss from storage * Average density (lb/gal)
Mixing losses (lb/yr) = Mixing rate (gal/day) * Assumed loss from mixing * Average density (lb/gal) * 365 day/yr
PTE of VOC/xylene (ton/yr) = (Dispensing losses (lb/yr) + Standing losses (lb/yr) + Mixing losses (lb/yr)) / 2000 lb/ton

**Appendix A: Emissions Calculations
Vapor degreaser (VDG1)**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Actual solvent usage (gal/day)	Operating hours (hr/day)	Solvent usage rate (gal/hr)	Density (lb/gal)	PTE of VOC/HAPs (lb/hr)	PTE of VOC/HAPs (ton/hr)
Vapor Degreaser	VDG1	1.82	8	0.2275	12.04	2.74	12.00

Notes:

These calculations are derived from Appendix A to the TSD for TVOP Renewal (T009-19529-00002).

Degreaser solvent is 100% trichloroethylene, a VOC and HAP

The vapor degreaser is used to degrease some parts prior to surface coating operation.

Assume all trichloroethylene is lost.

Approximately 18,000-28,000 parts are degreased per hour

Methodology:

Solvent usage rate (gal/hr) = Actual solvent usage (gal/day) / Operating hours (hr/day)

PTE of VOC (lb/hr) = Solvent usage rate (gal/hr) * Density (lb/gal)

PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Parts Washer (PW1)**

Company Name: BRC Rubber & Plastics, Inc.

Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359

Permit No.: T009-32966-00002

Minor Source Modification No.: 009-34769-00002

Significant Permit Modification No.: 009-34848-00002

Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Actual solvent usage (gal/day)	Operating hours (hr/day)	Solvent usage rate (gal/hr)	Density (lb/gal)	PTE of VOC (lb/hr)	PTE of VOC (ton/yr)
Parts Washer	PW1	3	8	0.375	6.76	2.54	11.10

Notes:

These calculations are derived from Appendix A to the TSD for TVOP Renewal (T009-19529-00002).

Degreaser solvent is 100% methyl ethyl ketone (MEK), a VOC and non-HAP

Assume all MEK is lost.

3 gallons of MEK is used per 8 hour shift.

Methodology:

Solvent usage rate (gal/hr) = Actual solvent usage (gal/day) / Operating hours (hr/day)

PTE of VOC (lb/hr) = Solvent usage rate (gal/hr) * Density (lb/gal)

PTE of VOC (ton/yr) = PTE of VOC (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Mixing and milling**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Line	Unit	Maximum capacity (lb/hr)	Control efficiency	Emission Factors (lb/lb)					PTE (lb/hr)					PTE (ton/yr)						
				PM	VOC	Total HAPs	Carbon disulfide	Isophorone	Uncontrolled PM	Controlled PM	VOC	Total HAPs	Carbon disulfide	Isophorone	Uncontrolled PM	Controlled PM	VOC	Total HAPs	Carbon disulfide	Isophorone
Primary	PMIX	3500	99%	9.00E-04	2.91E-04	1.20E-04	1.03E-04	-	3.15	0.0315	1.019	0.420	0.359	-	13.80	0.1380	4.461	1.840	1.571	-
	PMILL	3500	N/A	-	1.13E-04	2.06E-05	9.67E-08	1.12E-05	-	-	0.396	0.072	0.000	0.039	-	-	1.732	0.316	0.001	0.172
Secondary	SMIX	1000	99%	9.00E-04	2.91E-04	1.20E-04	1.03E-04	-	0.90	0.0090	0.291	0.120	0.103	-	3.94	0.0394	1.275	0.526	0.449	-
	SMILL	1000	N/A	-	1.13E-04	2.06E-05	9.67E-08	1.12E-05	-	-	0.113	0.021	0.000	0.011	-	-	0.495	0.090	0.000	0.049
NE	NEMIX	3800	99%	9.00E-04	2.91E-04	1.20E-04	1.03E-04	-	3.42	0.0342	1.106	0.456	0.390	-	14.98	0.1498	4.843	1.997	1.706	-
	NEMILL	3800	N/A	-	1.13E-04	2.06E-05	9.67E-08	1.12E-05	-	-	0.429	0.078	0.000	0.0426	-	-	1.881	0.343	0.002	0.187
Insignificant	R&DMIX	6	99%	9.00E-04	2.91E-04	1.20E-04	1.03E-04	-	0.01	0.0001	0.002	0.001	0.001	-	0.02	0.0002	0.008	0.003	0.003	-
	R&DMILL	6	N/A	-	1.13E-04	2.06E-05	9.67E-08	1.12E-05	-	-	0.001	0.000	0.000	0.00007	-	-	0.003	0.001	0.000	0.0003

Notes:

Emission factors from AP-42 Chapter 4, Section 12.

Calculations for PMIX, PMILL, SMIX, and SMILL have been updated using AP-42 emission factors.

Assume that 100% of rubber in the line is Compound #10 for worst-case of VOC and HAPs emissions from mixing

Assume that 100% of rubber in the line is Compound #3 for worst-case of VOC and HAPs from milling and PM emissions from mixing

Worst-case single HAP for mixing and milling is carbon disulfide and isophorone, respectively.

PM=PM₁₀=PM_{2.5}**Methodology:**

PTE (lb/hr) = Maximum throughput (lb/hr) * Emission factor (lb/lb)

PTE of controlled PM = PTE of controlled PM * (1 - Control efficiency)

PTE (ton/yr) = PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

326 IAC 6-3-2 Limit

Line	Unit	Total throughput (lb/hr)	Process weight rate (ton/hr)	Allowable emissions (lb/hr)
Primary	PMIX	3500	1.75	5.97
Secondary	SMIX	1000	0.50	2.58
NE	NEMIX	3800	1.90	6.30

Notes:

These units are all able to comply with 326 IAC 6-3-2 before control, therefore the baghouses are considered voluntary control.

Methodology:

Process weight rate (ton/hr) = Total throughput (lb/hr) / 2000 lb/ton

Allowable emission (lb/hr) = 4.10 * Process weight rate (ton/hr)^{0.67}, pursuant to 326 IAC 6-3-2(e)

**Appendix A: Emissions Calculations
Rubber Coating (RCOAT)**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Weight of clay (lb/drum)	Clay usage (batches/drum)	Weight of clay (lb/batch)	Actual usage (lb/batch)	Material loss (lb/batch)	Actual throughput (batches/yr)	Maximum throughput (batches/yr)	Maximum throughput (lb/yr)	Emission factor	PTE of PM (ton/yr)
Rubber coating	RCOAT	220	150	1.467	0.676	0.791	16000	33600	49280	5%	0.66

Notes:

These calculations are based on additional information provided by the source on August 5, 2013.

After rubber is milled it passes through a suspension of clay (Halcoat) and water solution

1 drum of clay weighs 200 lbs and coats 150 batches of rubber.

Approximately 16,000 batches of rubber are mixed per year at 10 shifts per week.

Actual usage (lb/batch) is the actual amount of Halcoat used per batch of rubber, as reported by the source.

Assume worst-case that 5% of material lost is particulate emissions

$PM = PM_{10} = PM_{2.5}$

Pursuant to 326 IAC 6-3-1(b)(5), this unit is exempt from 326 IAC 6-3-2 because it uses dip surface coating.

Methodology:

Weight of clay (lb/batch) = Weight of clay (lb/drum) / Clay usage (batches/drum)

Material loss (lb/batch) = Weight of clay (lb/batch) - Actual usage (lb/batch)

Maximum throughput (batches/yr) = Actual throughput (batches/yr) / 10 shifts/wk (actual) * 3 shifts/day * 7 days/wk

Maximum throughput (lb/yr) = Maximum throughput (batches/yr) / Clay usage (batches/drum) * Weight of clay (lb/drum)

PTE of PM (ton/yr) = Maximum throughput (batches/yr) * Material loss (lb/batch) * Emission factor * 1 ton/2000 lbs.

**Appendix A: Emissions Calculations
Self-contained sand blaster (SBLAST)**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359
Permit No.: T009-32966-00002
Minor Source Modification No.: 009-34769-00002
Significant Permit Modification No.: 009-34848-00002
Reviewer: Ryan Graunke

Table 1 - Emission Factors for Abrasives

Abrasive	lb PM/lb abrasive	lb PM ₁₀ /lb PM
Sand	0.041	0.70
Grit	0.010	0.70
Steel Shot	0.004	0.86
Other	0.010	0.70

Uncontrolled PTE of PM and PM ₁₀					Emission factors		Uncontrolled PTE - PM		Uncontrolled PTE - PM ₁₀	
Emission Unit	Emission Unit ID	Number of nozzles	Fraction of time of wet blasting	Flow rate (lb/hr)	PM (lb/lb sand)	PM ₁₀ (lb/lb PM)	lb/hr	ton/yr	lb/hr	ton/yr
Self-contained sand blaster	SMIX	1	0%	12.5	0.041	0.70	0.51	2.24	0.36	1.57

Notes:

These calculations are derived from the Permit Renewal Application received by OAQ on August 30, 2004.
Emission factors from STAPPA/ALAPCO "Air Quality Permits", Vol. I, Section 3 "Abrasive Blasting" (1991 edition)

Methodology:

Uncontrolled PTE of PM (lb/hr) = Flow rate (lb/hr) * PM emission factor (lb/lb sand) * (1 - Fraction of time of wet blasting/200) * Number of nozzles

Uncontrolled PTE of PM₁₀ (lb/hr) = Uncontrolled PTE of PM (lb/hr) * PM₁₀ emission factor (lb/lb PM)

Uncontrolled PTE (lb/day) = Uncontrolled PTE (lb/hr) * 24 hrs/day

Uncontrolled PTE (ton/yr) = Uncontrolled PTE (lb/hr) * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Carbon silos (CSILO)**

Company Name: BRC Rubber & Plastics, Inc.
Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359

Permit No.: T009-32966-00002

Minor Source Modification No.: 009-34769-00002

Significant Permit Modification No.: 009-34848-00002

Reviewer: Ryan Graunke

Emission Unit	Emission Unit ID	Usage (lb/yr)	Estimated loss	PTE of PM (ton/yr)
Carbon silos	CSILO	1,700,000	0.1%	0.85

Notes:

These calculations are derived from the Permit Renewal Application received by OAQ on August 30, 2004.
Usage rate provided by source as carbon usage in 1998.

Calculations

PTE of PM (ton/yr) = Usage (lb/yr) * Estimated loss * 1 ton/2000 lbs

**Appendix A: Emissions Calculations
Phosphate lines**

Company Name: BRC Rubber & Plastics, Inc.

Address City IN Zip: 623 West Monroe Street, Montpelier, IN 47359

Permit No.: T009-32966-00002

Minor Source Modification No.: 009-34769-00002

Significant Permit Modification No.: 009-34848-00002

Reviewer: Ryan Graunke

Automatic Phosphate Line (Phosline #1)

Tank	Material	Material used (gal/month)	Density (lb/gal)	Material used (lb/month)	PTE of PM (ton/yr)	PTE of HCl (ton/yr)
Alkaline Soak	Defoamer	4	9.00	36.0	0.04	-
	CD013 - Soak A	81.5	12.50	1018.8	1.22	-
Acid Pickle	P518 - Acid	36	11.26	405.3	0.49	-
Phosphate	CP840 - Phosphate	30.5	13.34	407.0	0.49	-
	748BR - Calcium additive	13	12.18	158.3	0.19	-
	702B - Nitrite additive	0.2	10.84	2.2	0.00	-
Sealer	RP2324B - Rust Preventative	43	8.84	380.1	0.46	-
Total:					2.89	-

Manual Phosphate Line (Phosline #2)

Tank	Material	Material used (gal/month)	Density (lb/gal)	Material used (lb/month)	PTE of PM (ton/yr)	PTE of HCl (ton/yr)
Alkaline Soak	Descaler	2	9.00	18.0	0.02	-
	CD013 - Soak A	81.5	12.50	1018.8	1.22	-
	CL013 - Soak B	17	12.34	209.8	0.25	-
Acid Pickle	HCl Acid	47	9.84	462.5	0.56	0.56
Phosphate	CP840 - Phosphate	30.5	13.34	407.0	0.49	-
	748BR - Calcium additive	13	12.18	158.3	0.19	-
	702B - Nitrite additive	0.2	10.84	2.2	0.00	-
Sealer	RP2324B - Rust Preventative	43	8.84	380.1	0.46	-
Alumabrite	Alumabrite	14	9.42	131.9	0.16	-
Total:					3.35	0.56

Chlorination Tank

Tank	Material	Material used (gal/month)	Density (lb/gal)	Material used (lb/month)	PTE of PM (ton/yr)	PTE of HCl (ton/yr)
Chlorination	HCl Acid	4	9.84	39.4	0.02	0.02
	Sodium hypochlorite	81.5	9.75	794.6	0.48	-
Total:					0.50	0.02

Methodology:

These calculations are based on additional information provided by the source on August 5, 2013.

Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or Provided in MSDS

Material used (lb/month) = Material used (gal/month) * Density (lb/gal)

PTE (ton/yr) = Material used (lb/month) * 20% (or 10% for chlorination tank) * 12 months/yr * 1 ton/2000 lbs

Of the material replenished, 20% from the phos lines and 10% from chlorination is emitted as PM and/or HCl

PM=PM₁₀=PM_{2.5}

Methodology:

Density (lb/gal) = Specific gravity * Density of water (8.34 lb/gal) or Provided in MSDS

Material used (lb/month) = Material used (gal/month) * Density (lb/gal)

PTE (ton/yr) = Material used (lb/month) * 20% (or 10% for chlorination tank) * 12 months/yr * 1 ton/2000 lbs



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

November 7, 2014

TO: Montpelier Harrison Township Public Library

From: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Subject: **Important Information for Display Regarding a Final Determination**

Applicant Name: BRC Rubber & Plastics, Inc.
Permit Number: 009-34848-00002

You previously received information to make available to the public during the public comment period of a draft permit. Enclosed is a copy of the final decision and supporting materials for the same project. Please place the enclosed information along with the information you previously received. To ensure that your patrons have ample opportunity to review the enclosed permit, **we ask that you retain this document for at least 60 days.**

The applicant is responsible for placing a copy of the application in your library. If the permit application is not on file, or if you have any questions concerning this public review process, please contact Joanne Smiddie-Brush, OAQ Permits Administration Section at 1-800-451-6027, extension 3-0185.

Enclosures
Final Library.dot 6/13/2013



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Thom Maher
BRC Rubber & Plastics, Inc.
589 US 33 South
Churubusco, IN 46723

DATE: November 7, 2014

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Significant Permit Modification
009-34848-00002

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Barbara Knecht – CHMM HZW Environmental Consultants
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 6/13/2013

Mail Code 61-53

IDEM Staff	GHOTOPP 11/7/2014 BRC Rubber & Plastics, Inc 009-34848-00002 Final		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

Line	Article Number	Name, Address, Street and Post Office Address	Postage	Handing Charges	Act. Value (If Registered)	Insured Value	Due Send if COD	R.R. Fee	S.D. Fee	S.H. Fee	Rest. Del. Fee	Remarks
1		Thom Maher BRC Rubber & Plastics, Inc 589 US 33 South Churubusco IN 46723 (Source CAATS) via confirmed delivery										
2		Blackford County Commissioners 110 West Washington Street Hartford City IN 47348 (Local Official)										
3		Blackford County Health Department 506 E. Van Cleve Street Hartford City IN 47348-1846 (Health Department)										
4		Ms. Mary Shipley 10968 E 100 S Marion IN 46953 (Affected Party)										
5		Montpelier Harrison Twp Public Library 301 S Main St Montpelier IN 47359-1428 (Library)										
6		Daryl & Lois Hoffman 7750 N. CR 75 E Lizton IN 46149 (Affected Party)										
7		Mr. Dan Baugey 103 Lakeview Drive Hartford City IN 47348 (Affected Party)										
8		Montpelier City Council and Mayors Office 300 W. Huntington St. Montpelier IN 47359 (Local Official)										
9		Ms. Barbara Knecht, CHMM HZW Environmental Consultants, LLC 6105 Heisley Road Mentor OH 44060 (Consultant)										
10												
11												
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Total number of pieces Listed by Sender	Total number of Pieces Received at Post Office	Postmaster, Per (Name of Receiving employee)	The full declaration of value is required on all domestic and international registered mail. The maximum indemnity payable for the reconstruction of nonnegotiable documents under Express Mail document reconstructing insurance is \$50,000 per piece subject to a limit of \$50, 000 per occurrence. The maximum indemnity payable on Express mil merchandise insurance is \$500. The maximum indemnity payable is \$25,000 for registered mail, sent with optional postal insurance. See Domestic Mail Manual R900, S913, and S921 for limitations of coverage on inured and COD mail. See International Mail Manual for limitations o coverage on international mail. Special handling charges apply only to Standard Mail (A) and Standard Mail (B) parcels.
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